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ABSTRACT

This report examines sex discrimination in institutions of higher education and the implications for all Office of Education programs. Part I presents an overview of sex discrimination in education, including: (1) early education reinforces ideals of male superiority; (2) sex discrimination in secondary education; (3) biases in postsecondary education; (4) women with special needs encounter additional difficulties; (5) the education system as an employer; and (6) research and development. Part II describes the relationship between the federal education agencies and the pervasive sex discrimination documented in Part I. Chapter I outlines existing discrimination in Health, Education and Welfare programs and necessary steps to carry out a legal mandate to end discrimination in federal education programs. Chapter II presents a plan for creative federal leadership in fulfilling the spirit of the laws against sex discrimination. (Author/MJM)

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A LOOK AT WOMEN IN EDUCATION:

ISSUES AND ANSWERS FOR HEW

Report of the Commissioner's Task Force
on the Impact of Office of Education Programs on Women

November 1972

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U.S. Office of Education
Department of Health, Education, and Welfare

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PREFACE

How can education--known for decades as a "women's field"--be guilty of discrimination against women? This report, addressed first of all to that paradox, summarizes the evidence that our educational institutions everywhere have been denying females their right to equal opportunities as students and as employees. Second, it explains how HEW education aid has contributed to sex discrimination and recommends action to make Federal education programs part of the solution, not part of the problem.

In the wake of rising public concern about discrimination against women in education, the Commissioner of Education (then Sidney P. Marland, Jr.) established last May a task force to investigate the impact of Office of Education programs on women. Just a few months earlier, the HEW Women's Action Program had called attention to sex bias in several Office of Education programs and recommended changes; Secretary Richardson asked that they be implemented. Meanwhile, by late spring, more important events were at hand as Congress moved toward enactment of sweeping legislation banning all Federal education aid to any institution or individuals practicing sex discrimination.

Believing that these events had profound implications for all Office of Education programs and deserved a studied, comprehensive agency response, Commissioner Marland asked his 12-member task force to report back with findings and advise on the agency's response. This is that report.

Besides the Office of Education, the task force also looked at the activities of two other HEW units: the new National Institute of Education, whose research and development functions were still part of OE when the task force began its work, and the Office for Civil Rights, whose enforcement efforts will certainly affect the speed with which the education community meets women's demands for equality.

The information presented here was gleaned both from the general literature on sex bias in education and from agency program staff. To find out about the relationship between specific programs and sex discrimination, we worked from questionnaires tailored to individual programs--sometimes by gathering responses in writing, more often by personally interviewing program administrators and staff. Questions were far-ranging: they covered program participation by sex, the role of women in administering projects in the field, past efforts to reduce sex discrimination in agency programs and special projects aimed at expanding opportunities for women.

Information on many programs was sketchy or nonexistent, either because very little information of any kind is gathered at the Federal level (as in many formula grant programs) or because programs

have not yet recognized the need to collect data comparing the participation of males and females. The task force study, then, has only scratched the surface, and we hope that it will prompt program officials to look much more closely at the relationship between their own programs and sex discrimination.

The 12 task force members represented various shades of opinion about the role of women in American society; the viewpoints and recommendations presented here reflect a consensus rather than complete unanimity. Despite differing viewpoints, we did agree on several fundamental premises which underlie the report:

-- that every person has a basic human and constitutional right to equal opportunity;

-- that the education system must strive to enable each individual to explore his or her unique potential to the fullest; and

-- that both males and females are now prevented from doing that by society's insistence on traditional definitions of the proper roles of men and women.

With women's rights, as with other areas of civil rights, the issue is basically a human one: how do we see that all Americans--males and females, rich and poor, black, brown and white--can take their places as human beings with the same human and civil rights?

For it is clear that discrimination against women is part of a much broader problem of exploitation and exclusion in American society. Women share the experience of second-class citizenship with ethnic minorities, the handicapped and the poor. While the task force was not able to analyze the educational needs of these groups, we do believe that many of our recommendations also apply to them. We urge that agency officials consider this as they act on task force recommendations.

We have presented our report in two parts. The first, a summary of the problems women face throughout American education, reflects the task force's concern that sexism in education is still a little understood phenomenon. We hope that the report will help to inform people, both inside HEW and out, about the seriousness and magnitude of the inequalities women confront within the education system. The second part examines the relationship of HEW education programs to the problem and presents an agenda for action.

Women seeking equal opportunities in education have just begun to win public recognition for their grievances. In this media-oriented society, gaining public attention is genuine progress.

The question now for Federal education officials, as for educators throughout the nation, is whether we will now move beyond that symbolic victory to substantive change. That is the challenge.

November 1972

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PART I

SEX DISCRIMINATION IN EDUCATION: AN OVERVIEW

Part I describes the many ways in which sex discrimination in the educational system works against women, both as students and as workers.

SEX DISCRIMINATION IN EDUCATION: AN OVERVIEW

As the decade advances, equality for women is emerging as one of education's thorniest and most urgent issues. And little wonder.

At a time when women are demanding equality as both a human and a constitutional right, our schools are still imparting concepts of male superiority. Although women are close to half the working population, education is still primarily preparing them to be housewives. As an employer, the education system is equally guilty. Women working in education can generally expect lower pay, less responsibility and far less chance for advancement than men working at the same level.

The situation is not without its bright spots. But mounting evidence makes it clear that unequal treatment of the sexes is the rule in education, not the exception. As a girl progresses through the education system, she confronts serious biases and restrictions at each level, simply because she is female.

EARLY EDUCATION REINFORCES IDEAS OF MALE SUPERIORITY

From the time they first start school, children learn from teachers, textbooks, games and films that males are superior to females.

Elementary school textbooks reveal startling biases. Females are continually underplayed as topics of interest. An extensive study covering 144 readers from 15 reading series, varying from primer to 6th grade level, disclosed that while boys were the focus of 881 "amusing and exciting" stories, only 344 of these stories centered around girls. Similarly, there were 282 stories featuring adult males, but only 127 stories about women. In addition, there were 131 biographies of famous men, but only 23 of famous women.[1]

Derogatory comments aimed at girls in general were common in all these readers. One reader depicts a girl getting lost in London with the caption, "Girls are always late." Another primer denigrates girls with a "Look at her, Mother, just look at her. She is just like a girl. She gives up." and again with "You cannot write and spell well enough to write a book. You are just two little girls." [2]

Other sex stereotypes are commonly threaded through grade school curriculum materials. Girls emerge as passive, dependent, and incompetent, while boys are active, self-reliant, and successful. Mothers mostly appear as housecleaners, clothesmenders, grocery shoppers and cake bakers; fathers are wage earners.

The negative influence that biased curriculum materials exert on children is reinforced by differences in the way teachers and administrators treat boys and girls. Teachers communicate their expectations of "feminine" and "masculine" behavior in subtle ways: girls are asked to do light classroom chores (watering the flowers or decorating the Valentine box), boys are assigned to the heavier and more responsible tasks (moving chairs or hall patrol). Physically active girls are labeled "tomboys"; boys who cry are "sissies."

Then too, the traditional classroom set-up, with children sitting quietly row by row, is difficult for most children, but especially hard for boys who have been encouraged from birth to be physically active. Teachers tend to reward passivity and obedience, qualities many girls have already acquired.

This dichotomy in roles is undoubtedly reinforced when children look at adult roles in their own schools, where they are likely to see that women teach and men run things: an early and potentially damaging lesson in "career education." For while 85 percent of all public school elementary teachers are women, 79 percent of the elementary school principals are men.[3]

By the time children are ready to leave grade school, they have already begun to develop distinct impressions of the limitations placed on them because of their sex.

SEX DISCRIMINATION IN SECONDARY EDUCATION

Once children reach secondary school, they are likely to confront even more rigid sex stereotyping. Both girls and boys may be prevented from taking advantage of certain educational activities, although restrictions facing girls are far more serious than those boys usually face.

Sex-biased Curriculum Materials

Sex biases in the curriculum are a problem at this level too, though the focus has shifted: women are ignored more often than maligned. In history and social studies texts, for example, women--their achievements and their concerns--are virtually invisible. The history of women's exploitation and their struggle for equality is dealt with superficially, if mentioned at all.

Stereotyping Interests and Abilities

Early on, girls and boys discover they are expected to develop different "aptitudes"--boys in math and science, girls in English and the arts. Teachers, principals, and parents may encourage boys to pursue these "masculine" fields, but admonish girls to stick to the "feminine" fields. There is no question that these sex stereotypes have an effect. The National Assessment Study discovered, for instance, that while there was little difference between boys and girls in science writing at age 9, the gap widened increasingly at ages 13, 17, and young adulthood.[4]

Sex-Segregated Courses

Children who do display unconventional interests may be blocked from pursuing them because appropriate courses are restricted to the other sex. Home economics and industrial arts classes are frequently segregated by sex, making it difficult for both sexes to acquire basic home management skills. Men don't learn to cook or mend; women can't put up a shelf or fix an electrical outlet. Young people are becoming interested in what the other half is learning: in an informal survey taken in Boston recently, girls in traditionally female vocational education said they would rather take industrial arts than home economics, if they had the chance. Students of both sexes have begun to demand that these courses be coeducational. A few pioneering school districts have combined home economics and industrial arts into courses covering a range of "survival" skills, others have devised "bachelor cooking" courses, while others have simply opened up the old courses to both sexes.

Segregated Academic and Vocational Schools: Separate But Not Equal

Opportunities for girls are further limited by restricted admissions in schools. Academic and vocational high schools in large school districts sometimes exclude one sex entirely or require higher admissions standards for girls than for boys. Simply because of their sex, students may find themselves ineligible for the school offering the best or only courses in their field of interest.

Until recently, New York City excluded girls from two of the city's high quality public academic high schools specializing in science, mathematics and technology. Two years after a court order opened the first school, the Board of Education was still listing these schools for "boys only" in its official catalogue.[5]

Vocational high schools in big cities are also frequently sex segregated. A 1971 telephone survey by OE's Office of Legislation found, for example, that the District of Columbia had four (two for men, two for women); Baltimore, four (also two for each); and New York City, 18 (13 for males, five for females).

Separate does not mean equal. Boys' vocational high schools tend to offer training for more diverse and better paying jobs. The segregated schools in New York City prevent girls from taking courses in 17 different vocational fields: architectural drafting, dental labs processing, jewelry making, industrial chemistry and upholstery as well as areas in heavy industry. Boys are excluded from two.[6]

A comparison of Boston's two trade high schools, one for each sex, is particularly revealing.

Boys at Boston Trade High choose from courses in automobile mechanics, basic electronics, cabinetmaking, carpentry, drafting, electrical technology, machine shop, painting, plumbing, printing, sheet metal and welding. At Trade High School for Girls, on the other hand, students are only offered programs in clothing, foods, beauty culture, and commercial art. The average expected wage for trades taught at Trade High School for Girls is 47 percent less than that for the trades available at Boston Trade High School for Boys.[7]

In addition, nonvocational course offerings at these schools are determined by sex. At Trade High School for Girls, students take typing and merchandising, while boys at Boston Trade learn geometry, trignometry and physics. Girls can study biology but not chemistry. Interestingly, the Boston school system makes exceptions for boys who want to be admitted to the girls' trade school (seven were enrolled in 1970), but no exceptions have ever been made for girls who sought admission to the trade school for boys.[8]

Limitations in Vocational Education

Justifications for this kind of rank discrimination range from the well meaning--"She won't be able to get a job"--to the absurd--"We can't let girls do metal work because they have to wear masks and work with sparks."9 Whatever the excuse, schools must stop denying students free choice in vocational training.

The fact is that some women want training in vocations now dominated by men, and vice versa. Women have succeeded, despite tremendous resistance, in all of these fields; during World War II the popular "Rosie the Riveter" served as evidence that women were effectively replacing men in many industry jobs. Sex discrimination in employment has been illegal since 1964; now it is illegal in vocational schools, too.

Equality in job training is not a minor concern for women. Despite the persistent myth that "woman's place is in the home," women are now a permanent and growing sector of the work force. Within the past thirty years, the number of women in the work force has more than doubled, so that today two out of every five workers are women.10 Nearly two thirds of the new jobs created during the 1960's were held by women.11

Nor are women only temporarily employed or merely working for "pin money." Seventy percent of all women employed are working full-time, and the average woman worker has a full-time worklife expectancy of 25 years.12 Nearly half the women employed in 1971 were working because of pressing economic need.13

So long as the schools continue to steer girls into vocational training for low-paying jobs, they will continue to contribute to the earnings gap between working women and working men. That gap is substantial and growing worse. In 1955, a woman working full-time earned only 64 percent of a man's earnings, but by 1970, she was only earning 59 percent as much.14

Athletics

Schools sponsor physical education and extramural sports because educators recognize the importance of life-long habits of physical fitness. These habits are needed as much by women, as workers and mothers, as by men. However, girls get short shrift in physical education, both at the secondary and higher education level. Schools and colleges devote greater resources to boys' than to girls' athletics: in facilities, coaches, equipment and interscholastic competition. In one midwestern district, school officials spent ten times as much on boys' athletics as on girls'; and there is no reason to believe that this school district was unusual.15 Girls are often either excluded from interscholastic competition or required to play under restrictive rules specially designed for girls' games. In one case, State rules for high school athletics forced a high school to deny its best tennis player both coaching and the chance to compete. Why? The athlete was female.16

Expelling Pregnant Students

Discrimination is particularly severe for one group of students--those who become pregnant. Every year over 200,000 young women under 18 give birth.[17] Usually these young women are expelled from school at the first sign of pregnancy. Out of 17,000 school districts surveyed in 1970, fewer than one third offered pregnant school-age girls any education at all.[18] School districts that did allow students to study during pregnancy usually kept them at home or segregated them in special classes for various reasons--on moral grounds, for special protection or for convenience.[19]

None of these reasons justify denying a young woman the right to regular public education with her peers. There is no evidence that pregnant students are morally contagious. Class attendance poses no greater health hazard to pregnant women than performing a job, doing housework or caring for other children--all things that women commonly do up until childbirth.

Expulsion compounds the already serious problems of teenage pregnancy. Of every 100 pregnant teenagers who leave school, 85 never come back. Rejected, cast out with a child to support and often no salable skills, these teenagers are nine times more likely to commit suicide than their peers.[20]

Eighty-five percent will keep their babies, either to raise an illegitimate child alone or to enter into a early marriage that is three or four times more likely to end in divorce than marriages in any other age groups.[21] Their children are four times more likely to have psychological problem than those with older parents. Among the teenage mothers who remain unmarried, 85 percent go on welfare.[22]

Guidance and Counseling

As a girl prepares to leave secondary school to take a job or to seek further education, school guidance counseling may further dissuade her from striking off in academic or vocational directions which may be her choice but which are usually reserved for men.

Many guidance counselors advise students to do what's "practical." Unfortunately, what is considered practical may lead to a tragic under-utilization of women's talents and skills. Counselors may advise girls to go into conventional "women's fields," regardless of their interests or abilities. But, as we have stated above, many girls are interested in other fields.

Sex discrimination in another form of guidance--vocational interest tests--has begun to attract public attention. One test, the Strong Vocational Interest Blank, received widespread attention when cited for sex bias in March 1972 by the American Personnel and Guidance Association. As the association's resolution calling for the test revision explained:

> The Blanks (SVIB) provide different occupational scores for men and women: women cannot be scored on occupations like certified public accountant, purchasing agent, and public administrator; men cannot be scored on occupations such as medical technologist, recreation leader and physical education teacher.
>
> When the same person takes both tests, the profiles turn out differently: one woman scored high as a dental assistant, physical therapist, and occupational therapist on the woman's profile, and as a physician, psychiatrist, and psychologist on the man's form.[23]

BIASES IN POSTSECONDARY EDUCATION

Although more and more women are demanding and gaining access to postsecondary education, the record is not one of consistent progress. The proportion of women undergraduates and professional students grew from 30 percent in 1950 to 41 percent in 1970, but was still smaller than it was in 1930. And women won a higher proportion of the doctorate degrees during the 1920's, 1930's, and 1940's than they did in the 1960's.[24]

According to one study, only half of the female high school graduates qualified for college work actually do go on to college, while 65 percent of the qualified men do.[25] The proportions of women shrink on each step of the educational ladder. Women earn just over half the high school diplomas; but they earn 43 percent of the bachelor's degrees, 40 percent of the master's degrees, and only 13 percent of the doctorates.[26]

Women also have a more difficult time gaining access to top quality education. In the 35 undergraduate institutions, both single sex and coeducational, judged the "most selective in the country" by one college handbook, women represented only 29.3 percent of the admissions in 1970. They were only 32 percent of those admitted to the coeducational institutions.[27]

Yet women perform as well or better than their male peers in both the secondary and the undergraduate years. Sex discrimination--in admissions, student aid awards and counseling--contribute to these disparities.

Admissions

Sex discrimination in admissions--commonplace in public and private institutions, single sex and coeducational--is one obstacle facing women seeking higher education.

Most of the approximately 300 institutions which exclude members of one sex are private, although a few public institutions close their doors to women. Of these, the U.S. military academies are the most prominent. Because of the single-sex pattern of higher education in Virginia in 1964, the State system that year rejected 21,000 women and not a single male. Since then, the State has changed its policies.[28] Sex discrimination in admissions to public institutions is particularly burdensome, since public education is in general, substantially less expensive than private education.

Most students attend coeducational institutions of higher education, and it is in admissions to these schools that discrimination against women is so damaging. Coeducational institutions, both public and private, use various strategies to limit the number of women admitted. Some use quota systems to maintain a steady ratio of male and female students, almost always with women in the minority. Cornell University, for example, maintains a male/female ratio of 3:1; Harvard/Radcliffe, 4:1.[29] The main campus at Pennsylvania State University, a public institution, this year ended a long-standing quota of 2.5 men to every woman.[30]

Other institutions simply demand higher admission standards for women than for men. Whatever the system, women usually come out on the short end. As a faculty member at one graduate school commented: "Our general admissions policy has been, if the body is warm and male, take it; if it's female, make sure it's an A- from Bryn Mawr."[31]

Student Aid

Sex discrimination in student aid awards is another roadblock for women seeking higher education. The Educational Testing Service (ETS) recently documented a clear pattern of sex discrimination in student aid. ETS found that women averaged $215 less in student financial aid than men, though women had equal financial need. To compound the problem, men working to defray college costs earned more than female students. This was not only true in off-campus jobs: the biggest disparities were in jobs provided by colleges and universities, where men averaged $300 per year, or 78 percent, more than women.[32]

Women are effectively excluded from certain kinds of scholarship aid. Government scholarships designed to attract men into military service, such as ROTC scholarships, have not been available to women, nor can most women qualify for veterans' benefits. Athletic scholarships, a significant portion of financial aid in some institutions, are limited to men. And many private scholarships and fellowships are designated for men only. Until 1969 New York University Law School, for example, excluded women from competition for Root-Tilden scholarships, generous $10,000 scholarships for "future public leaders," a category which apparently was felt to be suitable only for men.[33]

According to ETS, the only type of student aid where women averaged larger sums than men was in loans--probably because they receive less aid from other sources and must rely on larger loans.[34] Loans are an expensive way of financing an education for anyone, but they represent a particularly heavy burden for women, since women have less earning power than men.

Women who are married or raising children may have particular difficulty securing the aid they need to remain in or return to school. Financial aid officers may feel that these women do not need help, since they have husbands to support them, or that they are probably not serious about obtaining an education. In addition, financial aid is difficult to obtain for part-time study, which poses an additional handicap for women with children who can only attend school part-time.

Counseling

Counseling for women in higher education holds the same hazards it does for younger women in secondary schools. Advisors often urge women to avoid "masculine" academic fields or discourage them from applying to graduate schools where common wisdom has it that it's hard for women to get in. Women are often warned against seeking further education, despite good academic records:

- "Have you ever thought about journalism? (to a student planning to get a PhD in political science). I know a lot of women journalists who do very well."

- "A pretty girl like you will certainly get married. Why don't you stop with an M.A.?"[35]

Biases against women in each of these areas--admissions, student aid and counseling--are typically rationalized by widely-held prejudices and presumptions about women and their needs. It is assumed

that some man will always provide for a woman, that women won't complete their education, or that women don't really need an education. As a young widow with a five-year old child who needed a fellowship to continue her studies was told, "You're very attractive. You'll get married again. We have to give fellowships to people who really need them."[36]

In fact, none of these assumptions hold up. Millions of women will remain single, be divorced or widowed, or marry a low wage-earner.[37] According to the data available, women are slightly more likely to complete high school and slightly less likely to complete postsecondary degree programs than men in the same field. The more education a woman has, the more likely she is to hold a job. A study of female Ph.D's seven years after receiving their degrees found 91 percent working--81 percent full-time.[38] Moreover, it is shortsighted to suggest that a man needs a college education if he works for pay, while a woman doesn't if she works at raising children.

Undoubtedly, many of the myths persist because many people are simply unable to accept women as equals to men. The attitude is perhaps best expressed in a comment of Nathan Pusey while president of Harvard. Upon learning of the end to graduate student deferments during the Vietnam war, Pusey said, "We shall be left with the blind, the lame, and the women."[39]

WOMEN WITH SPECIAL NEEDS ENCOUNTER ADDITIONAL DIFFICULTIES

Because of their special life patterns, many women with family responsibilities experience special difficulties in acquiring an education. For mothers who wish to continue their studies while their children are young, finding adequate, affordable child care is a major problem. Others who interrupt their education to raise children or pay for a husband's education find returning to education limited by such problems as a dearth of part-time study opportunities and by credit transfer problems.

These problems are shared by women at all levels of the socio-economic scale whether they are looking for basic literacy education, occupational training or retraining, or a high school, undergraduate or graduate degree. Women with families need special services and flexible arrangements few education institutions have been willing to offer.

Child Care Needs

Students' child care needs have not been adequately met. Day care is not readily available for many people and costs are still prohibitive. While low-cost cooperative day care centers are growing in popularity, adequate child care can be expensive. A recent study of "quality" child care centers estimated average costs at $2,600 per child per year.[40]

A woman with children who is not working must add child care costs to her educational expenses, since she would no longer be at home providing these services free of charge. Without help in shouldering child care costs, large numbers of women must stay home or despite a desire to continue their education.

In postsecondary education, demands for child care assistance have exploded within the last three or four years. Child care centers subsidized partially at university expense have begun to appear on campuses. Centers often double as research laboratories for campus scholars and students. However, efforts to date are still grossly insufficient. The American Association of University Women reports that no more than 5 percent of our colleges and universities offer day care services.[41] Some are open only to faculty children; many impose extremely selective admissions criteria to deal with the surplus of applications. Waiting lists are long.[42]

The child care issue has not won much visibility in secondary and vocational schools, perhaps because these schools have traditionally refused responsibility for educating young women with children. With growing recognition that pregnancy and motherhood are not acceptable grounds for denying young people the right to public education, school systems will have to confront the child care issue. Child care services may be essential for keeping young mothers in school.

National statistics on the number of mothers seeking child care assistance in order to attend school are nonexistent. However, we do know that in 1971 over two million college students, 25 percent of the total national enrollment, were married.[43] And over 200,000 women under 18 have children each year.

Child care services have barely begun to meet the demands, either for women already struggling to balance studies and child care responsibilities, or for women who might return to education or training if they had access to acceptable child care.

Part-Time Study Needs

Although not as limiting as lack of access to child care facilities, other hurdles stand in front of the women who wish to return to school, including a dearth of part-time study opportunities. For many women, part-time study is often the only way to combine childrearing with learning. More and more people of both sexes, unable or unwilling to devote full time to education, are demanding access to postsecondary education.

Although no national data are available, part-time study opportunities clearly do not come close to meeting this demand. Part-time vocational or manpower training is extremely rare. Traditional continuing education courses offered part-time usually cannot be credited toward a degree, and many undergraduate schools still close their doors to all part-time students.

Academic Credit Problems

Because families often go where the husbands' opportunities take them, credit transfer problems in higher education are particularly acute among married women. Many institutions refuse to accept transfer credits from other institutions. Even if they accept academic credits already earned, no credit is normally given for the years of experience and learning these women have had outside the classroom.

The Age Handicap

Some institutions discriminate, either openly or covertly, against applicants over a certain age. This policy falls harshly on women hoping to continue their education after raising their children.

Both women and men can benefit from adjustments in conventional institutional practices. The failure of education institutions to respond to the needs of women and men returning to education is an unjust and inexcusable waste of valuable human resources. Not only are these individuals denied fulfillment of their potential, but the institutions themselves suffer by not using the wealth of experience these people have already acquired.

THE EDUCATION SYSTEM AS AN EMPLOYER

Women employed in the education system face discrimination practices just as damaging as those women experience as students.

Education, tradition has it, is a woman's field. Women make up the bulk of the Nation's teaching staff in the elementary and secondary schools; yet they remain a largely untapped and underutilized source of educational leadership. Women are denied equal pay and equal opportunity for advancement and they are channeled into a small number of "approved" educational fields. Wherever you look in education, women abound in the lower ranks and there, generally, they stay.

Women returning to careers in education face many of the same obstacles women returning as students encounter. Pregnant teachers frequently receive the same summary treatment as pregnant students--policies require them to leave the jobs while pregnant, often with no guarantee of a place when they return. Day care services or subsidies are rarely available to employees in education and part-time employment opportunities are scarce.

Women in Administrative Positions

Elementary and secondary schools are mainly staffed by women, but when teachers are selected to move into the administrative ranks, men are usually chosen. In school year 1970-71, 67 percent of all public school teachers were women, but women constituted:

- 31 percent of the department heads,
- 15 percent of the principals, and
- 0.6 percent of the superintendents.44

Presently, only two Chief State School Officers are women--those in Montana and Guam. When women do get into administrative positions, it is usually at the elementary school level where responsibility, pay, and status are lower. While 20 percent of the elementary school principals in 1970-71 were female, women were only 3.5 percent of the junior high school principals and 3 percent of the high school principals.45

In postsecondary education administration, women are even less visible, but the same pattern holds. Men dominate college and university administration, particularly at the policy-making levels. The National Education Association's 1971-72 survey of higher education institutions found that of 953 presidencies in 4-year

institutions, women held only 32; the proportion is about the same in 2-year colleges.[46] Even some of the women's colleges, which historically guaranteed women opportunities for administrative leadership, have been hiring male presidents in recent years.

Female trustees are rare. A 1970 American Association of University Women survey found that 21 percent of the institutions responding to the survey had not a single female trustee and another 25 percent had only one.[47] The only deanship women were likely to hold was dean of women; only 21 percent of the deans of administration, faculty or instruction were women.[48] Perhaps the most startling statistic was the sex breakdown of head librarians in 4-year higher education institutions--in a field 83 percent female, nearly 70 percent of the head librarians were men.

A long tradition of excluding women from top administrative positions in education may discourage some women from aspiring to administrative positions. However, the fact remains that administration is "the way up" in American public education in terms of salary, responsibility and status. It is absurd to conclude that many women year after year voluntarily turn their backs on these hallmarks of advancement.

Discrimination Against Women in Higher Education Faculties

Colleges and universities present an array of obstacles to women who want to teach at that level. Less than one in five faculty members is a woman. A recent study of the University of California at Berkeley pointed out that 23 percent of the university's doctorates in psychology went to women, but the last time a woman had been hired in the psychology department was in 1924.[50] Discrimination in hiring at large and prestigious institutions has forced many women to take jobs in small institutions with lower pay and status and less opportunity for research.

Once women join the faculty, discrimination makes it much harder for them to move up through the ranks than for men. Almost 40 percent of the full-time instructors at 4-year institutions are women, but the proportion of women drops with each rise in rank. Women comprise:

- 21 percent of the assistant professors,
- 15 percent of the associate professors, and
- 9 percent of the full professors.[51]

Women are likely to remain on each step of the academic ladder long after their male colleagues with the same qualifications have moved on. While it has been reported that females with doctorates "have somewhat greater academic ability than their male counterparts,"[52] barely half of all women with doctorates and 20 years of academic experience are full professors, but 90 percent of the men with the same qualifications have reached that rank.[53]

Taking into account all the possible factors influencing faculty rank, Astin and Bayer concluded in a recent analysis that sex discrimination is an important factor in determining faculty rank--more important than such factors as the number of years employed at the institution, the number of books published and the number of years since completion of education.[54]

In addition, it appears that the more prestigious the institution the less likely women are to penetrate the upper ranks. At Harvard University, to pick an obvious example, of 411 tenured professors in the Graduate School of Arts and Science in 1970-71, 409 were men.[55]

Salary Discrimination in Education

Institutions of higher education regularly pay women less than men of equal rank. In terms of median salaries by rank, women instructors earn $510 per year less than male instructors, and women full-time professors earn $1,762 per year less than their male counterparts.[56] And as time goes on, the gap is widening.

Astin and Bayer found that sex was a better independent predictor of salary than such factors as years of professional employment and type of advanced degree. The authors reported that by 1968-69 standards, female faculty members should receive an average of $1,000 a year more just to equalize their salaries with those of their male colleagues of equal rank and experience.[57] This is an extremely conservative estimate, since it does not take into account financial inequities attributable to other kinds of discrimination: in promotions, opportunities for research, hiring by high-paying institutions and other factors.

At present no data are collected on teacher salaries in elementary and secondary schools. However, in some States, elementary and secondary schools are prohibited by statute from paying women less than men of equal rank. In vocational education the median salary in 1969 for female teachers for all levels combined was $1,158 less than for men; women earned only 87 percent as much as their male counterparts.[58]

Sex Typing By Field

Within the education professions, positions are highly sex-typed. Women tend to be clustered in certain fields; men, in others. Women overwhelmingly dominate early childhood education, elementary education, and special education. They are 92 percent of the school librarians. In vocational education, most of the teachers in the health occupations, home economics, and office occupations are women. At the lowest end of the professional scale, almost all teacher aides and other educational paraprofessionals are female.

Men, on the other hand, have always dominated teaching positions in mathematics, the sciences, law, medicine and engineering. In vocational education teaching in agriculture, distributive education, technical education and trades and industry has been predominantly male.

In recent years, educators have begun to wage an energetic campaign to attract men into the fields of education customarily dominated by women. In some of these fields, the proportion of men has increased, stimulated perhaps by tight job markets elsewhere. If the same energy were devoted to bringing women into male-dominated fields, a few years could bring substantial changes.

Nonprofessionals in Education

Women employed as nonprofessionals experience similar discrimination in hiring, advancement and pay. HEW's Office for Civil Rights has turned up numerous cases of sex discrimination against nonprofessional employees. In one institution, custodial employees were divided by sex into "maids" and "janitors." Each had the same duties, but maids were paid substantially less. In another, 4 pay levels were created for the job of clerk; white males received the highest pay, black males next highest, white females came after that and black females were last. All of them had to have the same qualifications and perform the same work.

Career ladders for nonprofessionals and paraprofessionals are practically nonexistent. Despite growing popularity of teacher aides, few school systems offer these people, almost always women, the chance for training and advancement to professional responsibility and status. Like most employers, few education institutions have begun to face up to the need for career ladders to enable nonprofessional office workers to move into the professional office jobs.

RESEARCH AND DEVELOPMENT: HELP OR HINDRANCE?

Research and development can offer valuable insights and useful tools for tackling our most perplexing problems. Despite their potential, research and development to date have contributed little to our ability to solve one of education's most serious inequities: systematic discrimination against the female sex. In general, research and development people have shown only slight interest in exploring sex biases or testing ways of overcoming them. Moreover, studies too often reflect the anti-female biases of researchers.

Exploring Sexism through Research and Development

It is encouraging to note that there are increasing signs of interest in research relating to sex biases, particularly among female scholars. However, remarkably little scholarly work has been done on sex discrimination itself--either on the precise nature and extent of sex bias within the education system, its roots or its effects. An ERIC search for research materials on sex discrimination produced only 12 items, none containing any empirical results.[59] Too much of our information on sex discrimination is piecemeal, anecdotal or out of date.

Researchers have produced some information on sex differences and sex role development. They often report findings on differences and similarities between males and females--in play behavior, learning styles, interactions with teachers and in other situations. Where differences exist, causes are rarely explored. We still lack empirical evidence on the extent to which these differences are biologically or culturally determined.

Research on the way children develop concepts of appropriate sex role behavior has had similar limitations. There is (as we noted earlier) evidence that as children go through school, they progressively acquire clearer and more rigid ideas about what is expected of males and females. But we do not know to what extent schooling may be responsible or which aspects of the educational experience have the strongest influence on children's concepts of appropriate sex roles.

Much of the research on sex role stereotypes has another weakness: many studies reflect the researcher's assumption that accepting traditional masculine/feminine role differences is essential to a child's healthy development. In fact, learning all the "cannots" and "must nots" traditionally associated with being female in this society can be a crippling experience. Although there have been a few extremely provocative studies on this problem, many of the studies of sex role development appear to be motivated by a desire to see that boys and girls develop "proper" sex role concepts. For instance, researchers studying the effects of female teachers on boys frequently express a concern that boys may fail to develop "appropriate" sex role identification without male teachers as models.[60]

Unless the necessary research is put to use, it will provide little help to children in classrooms. It must be accompanied by the products of development--for instance, new curricula, teaching approaches, whole new forms and models that can be put to use in real educational settings. As matters stand, curriculum materials and teacher training techniques aimed at helping teachers avoid sexist behavior are virtually nonexistent. A few recent education experiments do have particular significance for women, e.g., a home-community based career education model and nonresident college degree programs with credit for nonacademic experience. However, serious

attempts to tackle some of the most basic problems, such as techniques to counter sex role stereotyping in the early preschool and school years, are lacking.

Biased Questionnaires

In addition to the dearth of helpful research and development relating to sex stereotypes and biases, many studies contain sex biases which distort findings and produce knowledge of little or no use in solving problems of discriminating against women. Even worse, these studies may reinforce popular misconceptions about women and encourage educational decisions harmful to them. Sometimes, for example, biases are based on the outdated assumption that woman's proper role is homemaker and dependent. Others seem to reflect attitudes that women, their lives and aspirations--and barriers to those aspirations--are not important enough to be studied.

Sex biases can be found in the kinds of questions researchers ask the population being studied. Project TALENT, a major 20-year longitudinal study of high school students which began with Office of Education support in 1960, offers some examples. The original questionnaire sent out to students recognized that mothers may work and that they may be chief family wage earners. But the questions about responsibilities on the job were limited to fathers' jobs. The questionnaire also included questions relating "your (or your future husband's)" salary to amounts of life insurance, savings and investments. Male students could not include a wife's expected income; female students could not consider combined incomes of self and spouse.[61]

Another example turned up recently in a draft questionnaire prepared for another major longitudinal study now in progress with NCES support.[62] A special questionnaire for those neither in school nor employed reflected a number of highly unscientific assumptions about the role of women. The researchers assumed that everyone who was not employed and not in school was a full-time homemaker and female. The questionnaire repeatedly referred to "your husband," although there are men who by choice or necessity stay home, tending house and/or children. Respondents were also asked what vocational training they would prefer, and the choices were all occupations traditionally attracting large numbers of women: secretarial, dental assistant, food services, beautician, child care. Another question asked whether respondents had taken noncredit adult education courses--courses for credit were not included, implying that women in the home would not be interested in academic education for credit. Fortunately, NCES recognized the problems with this questionnaire, and it has never been used. It is a useful example, however, of the kind of biases that creep into ostensibly "objective" and "scientific" research.

Single Sex Studies

Researchers sometimes pick members of one sex or the other as subjects for study. On the basis of an extensive ERIC search, the task force found that this practice tends to produce distorted information in areas of great importance to women. In the abstracts surveyed, single sex studies were more than two times as likely to use males as females. Seventy-eight dealt with males only and 34 dealt only with females. Again, most of the 34 abstracts on women did not contain empirical studies, while most of the ones on males did report study results.

Researchers are also much more likely to use males rather than females as a basis for generalizing about the whole population. In our review of the ERIC files, for example, less than half the titles of male-only studies indicated that only men had been studied, while more than three fourths of the titles of female-only entries filed indicated that only females had been studied.

The tendency of researchers to draw general conclusions from a study of males is particularly disturbing and particularly prevalent in research in areas of special importance to women, or where important differences can be expected between men and women. In the abstracts reviewed, male-only studies focused most often on careers, the poor and the emotionally and physically handicapped. Slow readers, school dropouts, underachievers, the physically fit and delinquents were also the topics of male-only studies.

Few of the female-only abstracts dealt with careers. None of the other topics appeared in female-only studies except delinquency, which rated a study on "clothing fabric selection" among delinquent girls. There were no studies of female dropouts, no studies of poor or ethnic minority females and no studies of handicapped or underachieving females.

Single sex studies may also reflect faulty assumptions that males have a corner on the problem or issue under study: "Women don't usually work," or "It's really black males who have the problems," or "Most dropouts are male." None of these assumptions are true. Women do usually work, black women are subject to both sex and racial discrimination and have extremely serious problems, boys are only slightly more likely to drop out. It is time researchers understood that women too have pressing needs and began affording them the same attention as men.

The tendency of educational researchers to focus on males makes designing education programs that meet women's needs much harder. A great deal of research has been undertaken on the theory that the knowledge gained can eventually be put to use in changing educational practice. Biased research put to use cannot help but lead to biased educational approaches.

From even a brief look at the status of women in education, it is abundantly clear that education contributes its share to the exploitation of women. Through its system of formal education, society should seek both to nurture young minds and to open doors to lifelong opportunities. On both counts, education is failing the female sex.

PART II

THE HEW MANDATE

Part II describes the relationship between the Federal education agencies and the pervasive sex discrimination we documented in Part I.

Chapter I outlines existing discrimination in HEW programs and necessary steps to carry out a legal mandate to end discrimination in Federal education programs.

Chapter II presents a plan for creative Federal leadership in fulfilling the spirit of the laws against sex discrimination.

THE HEW MANDATE

Until very recently, sex discrimination in education was perfectly legal. In fact, sex discrimination in the schools attracted little public attention. Only with the re-emergence of women's rights as a major national issue did sex discrimination in the schools begin to attract serious public attention.

Recent Executive and Congressional action now bars the Federal government from providing aid to an agency or institution practicing sex discrimination in education--either against students or against employees. In 1968, a Presidential Order called on universities and other Federal contractors to end sex discrimination in employment. In June 1972, Congress declared that "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal assistance...."[1] While some institutions are exempted, this law extends the sex bias ban to discrimination against both students and employees in almost all institutions receiving Federal education aid.

Both Congress and the President have spoken: wherever Federal education funds go, sex discrimination must stop. That mandate poses a tremendous challenge to HEW and to other government agencies with education programs.

Since the myth of female inferiority is part of the basic fabric of our education system, we can hardly expect sex discrimination to disappear with the stroke of a pen. As with any progress in civil rights, fundamental change will come only with vigorous and persistant action.

Responsible Federal agencies must take the lead with a creative mixture of information and exhortation, incentives and sanctions. The Assistant Secretary for Education and the agencies reporting to him must be heavily involved in that process. So must HEW's Office of Civil Rights and other Federal agencies engaged in education support.

CHAPTER I: THE LEGAL IMPERATIVE

As we noted, public concern about sex biases in education and laws protecting the rights of women in education are fairly recent. It is not surprising, then, to find that the Office of Education has been distributing Federal aid with no questions asked. As a result, much of the serious and widespread discrimination described earlier is being supported, in part, with Federal education funds.

Together, the two laws banning Federal education aid to individuals and agencies discriminating against women are comprehensive:

-- Executive Order 11246, as amended effective October 1968, bars sex discrimination in employment among all Federal contractors, although not among grantees. Contractors (which include almost all colleges and universities) must draw up plans both to correct current discriminatory practices and to overcome the effects of past discrimination. Plans must include specific goals and timetables for action. Violations can result in withholding or loss of all government contracts.[2]

-- Title IX of P.L. 92-318 enacted in June 1972 prohibits any individual or institution benefiting from Federal education aid from discriminating on the basis of sex, either against students or employees. All Federal education funds can be cut off if an institution fails to comply. There are limited exceptions. Religious institutions acting on religious grounds and military academies are completely exempted and admissions discrimination is still permissible except in vocational, graduate, professional and public coeducational undergraduate schools.[3]

This chapter explores the implications of these civil rights laws for HEW. It outlines:

-- major areas of sex bias directly supported by Federal education funds;

-- action already taken by a few OE offices to counteract sex discrimination in programs they administer;

-- steps the Assistant Secretary for Education and agency heads reporting to him must take to live up to basic legal requirements; and

-- steps the Office for Civil Rights should take to strengthen enforcement procedures.

Chiefly because the agency has not been concerned about the use of its funds to deny women equal opportunity, OE and NIE funds do directly support discriminatory practices of all kinds. In some cases, these are sins of commission--unequal pay for equal work, for instance. In others, they are sins of omissions--for example, the failure to recruit women actively in predominantly male training programs.

Below, we cite examples of these biases in several important areas, from career preparation to curriculum development to research. The problems highlighted here are by no means the only ones, but they are among the most important. Then, too, the task force was dependent on program information available in Washington: these are all program areas where some information on the impact on women was at hand.

Vocational and Manpower Training

As we indicated in Part I, vocational and manpower training programs, wittingly or unwittingly, are helping to channel the bulk of the Nation's female workers into low-paying jobs. OE's own programs are no different. The agency's programs have reinforced, rather than counteracted, a strong tradition of sex bias in vocational training. This is true of training programs for students under the Vocational Education Act (VEA) and for unemployed and underemployed adults--primarily the poor--under the Manpower Development and Training Act (MDTA).

OE programs tend to train women for a much narrower range of occupations than men--occupations which usually promise little pay, poor chances for advancement, and minimal challenge. By and large, male trainees select from a far greater range of training opportunities, resulting in relatively high paid skilled trade and technical jobs.

Under MDTA, a recent study discovered that the Department of Labor's individual referral service, which places people in some institutional MDTA programs, assigned male trainees to training for 177 different occupations; women were only assigned to 12.[4] Over half the female students in vocational education are being trained for support staff office jobs--receptionist, typist, file clerk and so on. In MDTA institutional training in 1970, half the women were trained for similar jobs: clerical and sales. Sixty-four percent of the men, on the other hand, learned "machine trades" and "structural work"-- two training categories which bring in considerably higher earnings after training.[5]

The differences in earnings these disparities will produce are tremendously costly to women throughout their working lives. In fact, the average female MDTA trainee earns less after training than the average male trainee does before training.[6]

A great deal of vocational and manpower training is completely segregated by sex. Separation of the sexes is taken for granted in our vocational and manpower training programs. So much so, that when States were asked to identify their best vocational education projects serving disadvantaged and handicapped students, 14 listed projects serving only one sex.[7] Annual reports on MDTA from 1967-70 feature a total of 103 photographs, barely 10 percent showing classes with both men and women.

Although home economics and industrial arts programs are not strictly vocational education, sex segregation is a common pattern here too. The $25.6 million Consumer and Homemaking Education program may be supporting extensive sex discrimination, since most school systems still exclude boys from home economics courses. While the program has no statistics on how many of its projects actively exclude boys, it does focus chiefly on courses designed to prepare young women for a dual role as worker and homemaker, and only 7 percent of the program's participants are male.

This year for the first time, vocational education funds can also be spent on industrial arts courses, which most school districts close to girls. If industrial arts courses do not open up to girls, OE may become a direct partner in still another kind of sex discrimination.

The limited career aspirations many girls acquire early in life are certainly an important factor in problems of sex typing in vocational training. But OE's vocational and manpower training programs must take their share of the blame. They have clearly failed to encourage girls to seek training for occupations promising more pay or better opportunities. In many cases, vocational and manpower programs have actively discouraged both sexes from training for careers dominated by the other sex.

Career Education

Top OE leadership has generated a great deal of interest in an important new concept that could tackle sex stereotyped career expectations early: career education. Career education aims to completely revamp elementary and secondary education in order to maximize career options for every student. Since it involves teaching children about careers from the early school years on, the new initiative has tremendous potential for counteracting prejudices concerning women's work roles before they are firmly developed.

Even so, without a conscious effort to prevent sex stereotyping in children's career ideas, career education will simply be a new way of reinforcing the old prejudices. Girls will learn earlier that they can expect to be stewardesses, secretaries and nurses; boys will learn earlier that they can expect to be astronauts and doctors, politicians and carpenters, draftsmen and business executives.

The task force did find indications that these biases are already developing in the OE/NIE career education effort:

-- A brochure from one exemplary career education project, which has become a model for school-based career education, says that classes should "teach us early to respect the work men do."8

-- Sex stereotyping is evident in several draft curriculum units under development for school-based career education. A third grade unit on retail jobs, "The Supermarket," for instance, makes it clear that all supermarket jobs but one (cashier) are men's jobs. Another, a home economics curriculum designed for ninth grade girls, only encourages girls to investigate careers related to home economics. Sex stereotypes pervade the entire unit. For example, when girls are asked about long range goals, the author lists looking for a part-time job and going to college to be a preschool teacher as expected responses.

-- Under another career education experiment now underway, employers themselves will provide students with career awareness, job experience and training and academic instruction. Since sex discrimination is virtually universal in the employment world, sex discrimination in the program itself is likely unless cooperating employers agree to offer both sexes the same opportunities. So far, no one has moved to guarantee participating female students equal treatment.

The career education program is working on one model that should benefit women: the home/community-based model aimed at reaching people, mainly women, in the home. Though this model has gotten off to a slow start, we are hopeful that it may help women in the home to enter or re-enter careers.

Educational and Public Relations Materials

OE, and now NIE, spend substantial resources on developing educational and training materials for national distribution. Even though the task force was able to examine only a few samples, we did find a number of sex biases. In addition to learning materials, the public information materials OE produces on its own programs sometimes contain the same kind of biases:

-- OE has funded the development of an extremely sex biased career guidance test as part of the career education efforts now administered by NIE. "The Self-Directed Search" tends to discourage girls from entering skilled trades and technical professions; boys are likely to be discouraged from entering office and service occupations now dominated by women. The test draws occupational preference profiles based on what students have done or like to do and on their own assessment of their competencies and talents. A girl who has never repaired a TV set, taken shop or been encouraged to believe she has scientific ability is likely to be steered away from the largest group of occupations listed--including forester, architectual draftsman, barber, air traffic controller, jeweler and optician. In the same way, boys may be dissuaded from looking into such fields as English teacher, philosopher and even foreign service officer.

-- A workbook designed to teach elementary school children action concepts shows boys and girls in sex-typed roles--boys are active, while girls are passive and domestic. Girls, not boys, are shown sitting, standing and sleeping--all "actions" without movement. Girls are also the only ones pictured sewing, washing dishes, cooking, playing with dolls and sweeping. Boys, on the other hand, are shown shoveling, marching, playing with tanks and cars, fishing, washing a car, painting a house and flying kites.[9]

-- OE's own public information materials have produced similar sex stereotypes. The most notable example, the "Career Education" film produced for OE-sponsored career education workshops, showed women in limited and stereotyped female occupational roles. All supervisors but one were male, and the lower paying occupations were generally held by women. The film had men in over 30 different occupations, women in fewer than 20. To his credit, former Commissioner Marland did recognize the problem with the film and recalled it for re-editing. Shortly before,

OE's American Education magazine had gone to press with an ad for the film, featuring a photograph of children in career education: boys posing as doctor, policeman and fireman; and a girl posing as a nurse.

Education Personnel

OE and NIE programs affect employment in education chiefly in two different ways: through jobs in agency-funded projects at the State and local level and through training in our many education personnel training programs (NIE has just one: Researcher Training). By and large, both jobs and training supported by the two agencies contribute to the overall inequities facing women who work in education.

Men overwhelmingly dominate the administration of OE and NIE funded projects. This is clear from information on project directors gathered by the task force; unfortunately, we could not obtain information on other project staff. In almost all of the programs which could furnish data on project directors by sex (approximately 40), fewer than one-fifth of the project directors were female.

According to program staff reports, most recent data showed there were no female directors in the 27 Education Leadership projects funded under the Education Professions Development Act (EPDA) Part D. Women headed only:

-- one out of 18 ERIC clearinghouses,
-- two of the 80 MDTA skills centers, and
-- three of the 106 Language and Area Centers funded under Title VI of the National Defense Education Act(NDEA).

No regional education laboratory or research and development center was headed by a woman, and 65 out of 67 laboratory and center program directors were men.

Women seem to be just as scarce in decision-making positions at the State level, according to the scattered information available. Here too, in most of the programs for which we did get statistics, fewer than 20 percent of the State program coordinators were female. Women represented only:

-- 3 percent of the State adult education directors,
-- 11 percent of the directors for Title III of the National Defense Education Act,
-- 4 percent of the directors for Title I of the Elementary and Secondary Education Act, and
-- 1 out of 56 State vocational education directors.

In the traditionally "female" fields, the record was better. Over half of the Right to Read program's 35 State coordinators were

women. For two library programs--Title I of the Library Services and Construction Act and ESEA Title II--the figures were 42 percent female and 36 percent female, respectively. These statistics are still disappointing, however, since 4 out of every 5 librarians are women.

Opportunities in Personnel Training. The record in promoting equal opportunities in education for women through OE and NIE personnel training programs is mixed. As expected, OE programs are generally training women for educational roles already dominated by women. They are being trained to serve as teachers and paraprofessionals in elementary and secondary, early childhood and special education. Men are being trained for roles which they already dominate: administration and leadership in education at all levels, teaching in higher education and research and development.

A few programs do seem to be contributing to equal opportunities for women and men in education. EPDA Part E serves a higher proportion of women than currently exists in higher education: while only 1 in 5 faculty members is female, 43 percent of the fellowships went to women in FY 1971-72, and a sampling of FY 1969-71 institute participants indicated that women were slightly less than one-third. In addition, several of the EPDA programs are bringing more men into elementary and secondary education by emphasizing veterans. The Career Opportunities Program raised the proportion of male aides being trained from 18 to 39 percent in one year. And EPDA Part B-2, in attracting and qualifying new educational personnel, focuses on mature women returning to work, a group badly neglected by most training programs. This program, however, is being phased out.

Despite these gains, the proportion of women is highest in training for jobs at the bottom of the career ladder (paraprofessionals) and lowest in training for jobs at the top (administration) throughout OE and NIE education personnel training programs:

-- Several programs funded under EPDA estimated that women were over 90 percent of the aides or paraprofessionals trained.

-- The Training Teacher Trainers program (TTT) funded under EPDA reported that women were 82 percent of the aides, 69 percent of the teachers, and 19 percent of the administrators trained.

-- Women were a scant 25 percent of the trainees in school administration under the EPDA Education Leadership program, according to program reports. Program staff reported that leadership training under the Education for the Handicapped Act also serves mostly men.

Moreover, many training programs clearly have not been serving women in the target population equitably. Since training, especially advanced training, can be the key to professional advancement, these programs are contributing to a system that advances men more readily than women, even in fields heavily dominated by women.

-- Though the overwhelming majority of school librarians are women, Title HEA II-B doctoral fellowships go mainly to men. In the program's first four years, school years 1966-67 through 1969-70, women in the program received only 38 percent of the doctoral degrees.[10]

-- Women have been seriously underrepresented in vocational education personnel training under EPDA Part F. According to program staff, 13 percent of the fellowship recipients were women. In contrast, women are over two-fifths of the people teaching secondary vocational education, where most vocational education staff can be found.[11]

-- Since 1964-65, women have received only 5 percent of the faculty research fellowships funded under the Fulbright-Hays Act. This is a small fraction of the proportion of women on the higher education faculties.

Access to Education

OE funds help to support the many discriminatory practices that make it particularly difficult for women to gain access to the education they want.

In student aid, for example, the ETS study mentioned earlier found discrimination against women in both the Equal Opportunity Grant Program and the National Defense Student Loan Program. Women were over half of the recipients in both programs, but the mean Equal Opportunity Grant for women was 20 percent less than that for men. Despite the fact that women typically receive more student financial aid through loans than men, women averaged slightly smaller loans than men under the National Defense Student Loan program.[12] These differences could not explained by differences in need, since the study found that male/female income levels were comparable.

In terms of admissions practices, OE funds go to a variety of institutions practicing discriminatory admissions policies, including single sex vocational schools now required in Title IX to open their doors to both sexes. In addition, thousands of school districts which regularly expel pregnant students participate in agency-funded programs.

Research

Sex biases were common in research and development materials examined by the task force. In fact, two examples of sex biases in research mentioned in Part I came from studies funded by OE: Project TALENT and the draft longitudinal study questionnaire to full-time homemakers (See page 19).

OE has funded numerous studies of just one sex. OE supported, for instance, a major study on the effects of dropping out of high school; only male dropouts were studied. Another study, in the planning stages at one of NIE's research and development centers, would investigate influences on the vocational education decisions of male black adolescents. Aimed at the development of "more effective career guidance for disadvantaged black youth," this study will shed no light on the career guidance needs of young black women.[13]

ACTION TO DATE

This task force is the Office of Education's first agency-wide attempt to confront these issues. Neither OE nor NIE has begun to act on the new legal mandate to eliminate biases in their own programs. However, a few programs have already taken first steps on their own initiative. For example:

-- The Bureau of Adult, Vocational and Technical Education (BAVTE) formally warned vocational educators to avoid discriminating against both students and employees on the basis of sex, as well as race, color and religion. Sent to State and regional staff in January 1972, BAVTE's memorandum on biases in vocational education represents OE's only warning to recipients of agency grants on sex discrimination.

-- The Researcher Training Program, now under NIE, notified FY 1972 applicants for training funds that they should work to develop the talents of women, as well as minorities, industry personnel and representatives of a wide variety of disciplines. This is an important step, although the addition of industry personnel and representatives of different disciplines dilutes the impact of the statement as an equal opportunity measure.

-- A few offices report that they have made some effort to review materials for sex biases: The Office of Public Affairs (public affairs materials), the

National Center for Educational Communications (materials on exemplary programs and practices slated for national dissemination) and the Center for Vocational Education Curriculum Development (vocational education curriculum materials). These efforts have not always been effective, though, as the examples of sex biases in public affairs materials mentioned earlier indicate.

-- The Vocational Education Exemplary Programs staff has urged project directors to make use of pamphlets encouraging training for girls in traditionally male occupational fields.

-- The Higher Education Training Program under EPDA Part E has established as one of its priorities programs preparing women for careers in higher education. Again, this is progress, although its impact is diluted since this is one of many priorities.

-- The Institute for International Studies (IIS) established its own task force last summer (1972) to assess the impact of IIS programs on women.

NEXT STEPS FOR HEW'S EDUCATION AGENCIES

With the enactment of new laws banning sex discrimination, OE and NIE's first responsibility must be to use all the administrative tools at hand to eliminate sex discrimination in agency programs. The Office for Civil Rights will take the formal actions necessary to secure institution-wide compliance for recipients of Federal funds. But tackling sex discrimination in education cannot, must not, be left solely to the work of an enforcement agency.

While OE and NIE have no powers to press for compliance throughout an entire institution, they do have sole authority for the conduct of their own programs. Since it is now illegal for these agencies to supply funds to any institution discriminating on the basis of sex, it is up to them to do whatever they can to prevent direct discrimination under OE and NIE programs.

OE and NIE must notify contractors and grantees about the new laws, secure assurances of compliance and monitor programs for

evidence of discrimination. In addition, both agencies will need to use their discretion over project grant programs as leverage to assure compliance in areas where discrimination against women has been especially acute. The informal pressure and leadership which the Assistant Secretary and his education agencies can provide, coupled with the case-by-case legal action from the civil rights office, are both needed to meet the challenge. All of these units will need to carry out their complementary responsibilities in close cooperation.

Making the Legal Requirements Known

As a beginning, NIE and OE need to provide explicit instruction to each recipient of their funds about its obligation to end sex discrimination. Notices must be placed in guidelines and other agency publications; applications must be changed to include an assurance that grantees will comply with the ban against sex discrimination. Both are already standard operating procedure for the racial discrimination ban in the Civil Rights Act of 1964.

Simple notification will not be enough; aid recipients will need guidelines spelling out their concrete responsibilities under the new law. Failure to provide these institutions with specific guidelines has caused difficulties in securing compliance with the Executive Order. OE has not furnished prospective contractors with the documents detailing required action: Department of Labor guidelines, Revised Order No. 4 or new HEW guidelines just developed for universities. Both OE and NIE must begin to supply these materials, along with regulations and guidelines on Title IX when available, routinely to all prospective beneficiaries of agency funds.

OE and NIE will need to act promptly. Title IX is already in effect, and FY 1973 projects should not be funded until an assurance of compliance is given. Where program documents have already appeared without these additions, program offices should distribute addenda at once to make up for that oversight.

Specific written guidance must be supplemented with working sessions between administrators and HEW staff where information and concerns about Title IX compliance and enforcement can be freely exchanged. That way administrators can discuss precisely how Title IX applies to their own policies and practices. Title IX workshops should reach a range of education personnel: school superintendents and university presidents, student financial aid and budget officers, career counselors and librarians and so on. NIE should direct similar efforts to researchers and research directors, heads of regional laboratories and R&D centers. OE should place special emphasis on informing State agency officials, since State staff will be responsible for monitoring local projects funded under State formula grant programs for compliance with the new law.

Monitoring for Compliance

Once the minimal legal forms and information needs are met, OE and NIE must include a check on Title IX compliance in their own monitoring activities. Many programs do attempt some monitoring--through site review teams, telephone checks or written reports. Whatever the method, program officers should look at the treatment of women in each program and take steps to resolve any problems they discover. Here again, OCR should help out by suggesting standards to be used in program monitoring.

Applying Leverage through Discretionary Authority

In addition, NIE and OE must use their discretionary authority to combat sex biases in program areas where discrimination is particularly damaging.

Instructional and Informational Materials. As we noted earlier, both agencies support the development of educational and public relations materials intended for broad national distribution: curriculum materials, teacher training techniques, program reports, films and so on. To stop perpetuating sex biases in these materials, NIE and OE should take several steps:

-- Notify developers, both inside the agency and out, of their obligation to avoid sex biases. This can be done formally--through guidelines, for instance--and informally--in the course of contract negotiations.

-- Produce a pamphlet on avoiding sex bias as a guide for developers. This would serve not only the agency's own needs for consistency, but also the growing number of people across the country who are becoming concerned with sex bias in the schools and in the media.

-- Review the products of agency-funded development efforts for sex biases before they are finalized. Most of these materials are already subject to review, either by the program unit supporting their development or, for public relations materials, by the Office of Public Affairs. To insure that materials are reviewed carefully for sex bias, specific staff people in appropriate offices should be designated to perform that job. These people should be named after consulting with women in each office about which staff members would be most sensitive to sex bias.

In most cases, sex stereotypes can be eliminated without much trouble. Changing photographs, revising a story line slightly, deleting words here or pictures there will usually suffice. For a

few projects, however, sexism will be so deeply lodged in the fundamental concept of the work that the only remedy will be complete rejection. We found one such case: the "Self-Guided, Search" guidance test developed at Johns Hopkins (see page 29) and urge that support for it be dropped.

Career Education. Both NIE and OE have already invested substantial energy in the success of Career Education. If we fail to use our influence to counteract sex bias in pioneer career education projects, these "models" and "exemplary programs" will offer new ways to reinforce outdated career aspirations for both girls and boys. Eliminating sex segregation should be established as a priority under all education and training programs for careers, and model and exemplary projects should be held accountable for involving both sexes in all activities.

Other Areas for Action. Other related recommendations speak for themselves; they range from promoting the advancement of women through training programs to avoiding sex biases in research.

Strengthening Title IX

Finally, we propose two additional steps designed to strengthen Title IX. Title IX covers all Federal agencies supporting education: the National Science Foundation, the Office of Economic Opportunity, the Department of Labor, the Department of Defense and so on. To our knowledge, these agencies have taken no action on Title IX. We suggest that the Federal Interagency Committee on Education work to get all appropriate Federal agencies moving on enforcement of Title IX.

We urge the Assistant Secretary to seek an amendment to Title IX itself, extending its coverage to admissions in elementary and secondary schools, to military academies, to single sex public undergraduate colleges. and private coeducational undergraduate colleges. There is no justification for allowing institutions which receive public monies to restrict educational opportunities for either sex. Both women and men ultimately suffer from this practice. We have avoided recommending that admissions to private undergraduate institutions be covered, however, since the task force could not agree on removing the exemption for these institutions. Half of the task force felt these institutions do have merit, and that as private institutions they should continue to qualify for Federal aid they may need to survive.

Making the Legal Requirements Known

1. We recommend that OE and NIE fully inform potential and actual recipients of Federal education aid of their obligations to eliminate sex discrimination under Title IX and Executive Order 11246. Specifically, we recommend that:

   a. All OE and NIE guidelines, regulations and other appropriate documents be amended to include a statement on Title IX, P.L. 92-318, and require applicants to submit an assurance of compliance. OE and NIE should attach an addendum to this effect to all FY 1973 program documents already printed without this statement.

   b. All OE and NIE contracts and grants officers provide all applicants with detailed instructions on their obligations under Title IX and Executive Order 11246 before they sign assurances of compliance. Contractors should receive a copy of Revised Order No. 4, Department of Labor guidelines and HEW guidelines. All potential aid recipients should receive Title IX regulations and guidelines when published.

2. We recommend that OE and NIE provide information and technical assistance concerning Title IX and its implications directly to State education personnel, school administrators and education personnel throughout the country. Specifically, we recommend that:

   a. Each Deputy Commissioner in OE and equivalent within NIE be responsible for conducting extensive workshops and conferences on Title IX for key State and local personnel in their respective areas of concern. All regular program workshops and conferences sponsored by the two agencies should include briefings on Title IX. These should be conducted on a continuing basis as long as sex discrimination remains a major problem in education. A specific person in NIE and OE should be designated to coordinate each agency's plans for these activities.

   b. The Commissioner of Education make Title IX a major topic of discussion in his next meeting

with the Chief State School Officers. He should emphasize the leadership role the Federal government will expect the State education agencies to play in eliminating sex discrimination at the State and local levels.

Monitoring for Compliance

3. We recommend that OE and NIE monitor their own programs for Title IX compliance. Specifically, we recommend that OE and NIE include compliance status checks on all regular site reviews, including State management reviews conducted under ESEA Title V. OE's Deputy Commissioners and equivalent officials in NIE should work with the Office for Civil Rights to develop reporting forms and uniform criteria for monitoring compliance status in site reviews.

Leverage through Discretionary Authority: Instructional and Information Materials

4. We recommend that OE and NIE insure that all instructional and public relations materials developed with OE and NIE funds for national distribution be free of sex biases. This would include career and vocational materials used in model and exemplary programs. Specifically, we recommer that:

   a. Guidelines, requests for proposals and other appropriate documents stress as a condition for funding that materials be developed without sex stereotyping.

   b. OE's Office of Public Affairs, in cooperation with OE and NIE program staff, develop a guidebook concerned with avoiding sex biases to assist contractors, grantees and agency staff in developing materials.

   c. OE and NIE designate at least one staff person within each appropriate program and public affairs office to clear new materials before their completion and dissemination. These staff people should be selected after consultation with the women in these offices.

   d. OE and NIE review existing projects for sex biases. As part of this effort, NIE support for the "Self Directed Search" guidance system developed at Johns Hopkins should be terminated.

Leverage through Discretionary Authority: Career Education

5. We recommend that OE and NIE work together to eliminate sex discrimination in career preparation. Specifically, we recommend that:

   a. OE and NIE establish the elimination of sex segregation as one of career education's major goals, and emphasize that new goal in materials explaining the career education concept.

   b. Program guidelines and other appropriate documents be amended to emphasize that the elimination of sex segregation is a priority in education and training for careers.

   c. Guidelines require all model and exemplary programs in career education and training report their success in including students of both sexes in all education activities.

Other Areas for Action--Training

6. We recommend that OE and NIE work to equalize the proportion of men and women at all levels and in all areas of education through training programs. Personnel training program guidelines should be modified to require applicants to include plans for increasing the numbers of male and female participants in fields where either sex is underrepresented as well as report annually on progress towards achieving that goal. Specifically, we recommend that:

   a. Greater numbers of women be trained in areas where they are currently underrepresented, such as educational administration in all fields, trades and industry in vocational education, educational research and development, educational technology, the "hard" sciences and in other appropriate areas.

   b. Greater numbers of men be trained for employment in entry level positions in areas where they are currently underrepresented, such as early childhood education, elementary education, special education, home economics, business/office education, the health professions and in other appropriate areas. In addition, greater numbers of men should be trained as paraprofessionals in all fields.

Other Areas for Action--Project Administration

7. We recommend that OE and NIE promote the involvement of women in top positions in OE-and NIE-funded projects. Specifically, we recommend that:

   a. OE and NIE amend guidelines for discretionary programs to require that applicants for funds submit data on title, salary and responsibilities of top project staff by sex.

   b. OE and NIE review that information for evidence of discrimination and negotiate before funding for the correction of any inequities.

   c. In all program guidelines and other official program documents, OE and NIE emphasize their interest in receiving applications from women and for projects directed by women.

   d. OE and NIE, working with women's organizations, encourage women to apply for discretionary program funds. Women's organizations should be included on appropriate mailing lists for application notification and guideline distribution.

Other Areas for Action--Research

8. We recommend that OE, NIE and the Assistant Secretary for Planning and Evaluation (ASPE) review for sex biases all research instruments to be used in education studies they fund.

9. We recommend that OE, NIE and ASPE insure, before funding education research projects, that projects studying people use samples of both sexes and report results by sex. Exeeptions should be made only when the information sought is already available for one sex or when a study is explicitly designed to serve the goal of equality of the sexes and special circumstances require a one-sex study.

   Specifically, we recommend that guidelines, requests for proposals and other appropriate documents state the conditions under which one-sex studies are permissible and request that anyone applying for funds for such a study provide a justification.

Strengthening Title IX

10. We recommend that the Federal Interagency Committee on Education explore the implications of Title IX for other Federal agencies providing education assistance and encourage those agencies to take the necessary action to enforce Title IX.

11. We recommend that the Assistant Secretary for Education strongly urge the amendment of Title IX to cover admissions in elementary and secondary schools, military academies, single sex public undergraduate colleges and private coeducational undergraduate colleges.

NEXT STEPS: THE OFFICE FOR CIVIL RIGHTS

The Office for Civil Rights (OCR) already handles Executive Order enforcement in higher education institutions. Title IX expands its sex discrimination enforcement authority to institutions of all kinds receiving Federal education aid, with very few exceptions.

OCR's work is absolutely critical to the effectiveness of any civil rights law applying to HEW programs. The Office interprets these laws through regulations and guidelines, conducts on-site compliance investigations, negotiates with institutions found out of compliance and notifies HEW agencies to terminate funding if contractors or grantees refuse to comply. Clearly, the impact of anti-sex discrimination laws will depend largely on how effectively OCR carries out its job.

Executive Order Enforcement

So far, the record in enforcing equal treatment for women in employment under the Executive Order has been disappointing. The Executive Order itself and enforcement efforts have proven weaken chiefly in two areas: accountability and compliance standards.

Accountability. Unless the government conducts a compliance investigation, a contractor is not accountable for its efforts to live up to the Executive Order. While they are required to develop an affirmative action program detailing plans to eliminate sex (and race) discrimination, contractors do not have to submit them to Federal officials; public agencies and small contractors are not even required to put them into writing. In fact, compliance investigators have found that many contractors that are required to put their plans in writing do not bother to do so, since they do not have to submit them for approval. The government neither approves affirmative action programs nor monitors progress in carrying them out as a routine matter.

Only if the enforcement unit (OCR, in HEW's case) decides to do a compliance investigation does an institution have to answer for the adequacy of its affirmative action program, or its efforts to live up to it. Investigations are costly and time consuming and only a small minority of institutions do undergo such an investigation. Trying to enforce the Order without routine review of all affirmative action plans would be like trying to achieve school desegregation by telling dual school systems they must desegregate, asking them to devise their own program (either written or unwritten) and then assuming that desegregation has occurred.

Compliance Standards. In addition, OCR has been slow in developing and promulgating specific standards for compliance. It took four years after coverage of sex discrimination was added to the Executive Order for OCR to come out with guidelines dealing with sex bias in higher education institutions. OCR has also failed to develop

uniform standards to guide its own personnel in compliance reviews. Investigations are handled by regional office staff, and procedures and compliance standards vary from region to region, from institution to institution. Not only does an absence of uniform standards frustrate effective civil rights policy, it is unfair to any institution making a genuine effort to comply with the Federal government's equal employment demands.

Enforcement of Title IX

Hopefully, Title IX enforcement will be more vigorous than efforts to date under the Executive Order. Of course, it is still too early to tell. We must make clear, however, our concern that OCR move promptly and decisively on Title IX enforcement. Regulations, now under development, must be specific enough to give educators a concrete understanding of what is expected, especially in terms of sex discrimination against students which the government has never before tackled. Detailed guidelines need to follow just as promptly.

OCR will need to provide regional offices with clear and uniform procedures for investigation and enforcement. We urge a special focus on sex discrimination at the State level, since State education agencies, with administrative responsibility for much of the Federal aid funds, exert a great deal of influence over the way local school districts spend their funds. We also strongly advise that the enforcement of Title IX to be carried out in coordination with efforts under the Executive Order. Not only would that minimize duplication of efforts, it would also ensure that each investigation covers discrimination against both students and employers.

Discrimination in OCR Staffing

As a law enforcement agency, the Office for Civil Rights has a special obligation to meet the standards it sets for others. OCR's record in hiring female professionals is appalling.

Women are only 11.6 percent of all OCR professionals GS-13 and over. In the mid levels, OCR employs 77 GS-13's--7 are women; 59 GS-14's--8 are women; and 31 GS-15's--4 are women.

Full-Time Professional OCR Staff, as of 11/12/72

Grade	Total	No. of Men	No. of Women	Percentage of Women
18	1	1	0	0
17	0	0	0	0
16	4	3	1	25
15	31	27	4	13
14	59	51	8	14
13	77	70	7	9
12	38	28	10	26
11	42	15	27	64
9	38	15	23	61
7	35	3	32	91

The Office for Civil Rights is charged with guarding the rights of women under billions of dollars worth of HEW grants and contracts. Minority groups have argued for a long time that full minority representation is the key to energetic civil rights enforcement. By the same token, rights of women in HEW programs can only be protected if women have an equal share in senior and decision-making positions in the Office for Civil Rights.

RECOMMENDATIONS

Executive Order Enforcement: Accountability

12. We recommend that HEW's Office for Civil Rights strengthen its procedures for holding contractors accountable for compliance to Executive Order 11246. Specifically, we recommend that HEW guidelines require contractors to submit affirmative action plans for approval whether or not a compliance review has been made; plans should be accepted or rejected within three months after submission.

Title IX Enforcement: Compliance Standards

13. We recommend that the Office for Civil Rights develop strong uniform procedures for investigating sex discrimination in education. Specifically, we recommend that:

    a. OCR develop a standard procedure for collecting and evaluating information at defined intervals on the compliance status of institutions under Title IX and Executive Order 11246.

    b. Investigations initiated under Executive Order 11246 be carried out in conjunction with investigations initiated under Title IX.

Title IX Enforcement: State Education Agencies

14. We recommend that the Office for Civil Rights work directly with each State to overcome present inequities experienced by women in State education agencies. Specifically, we recommend that OCR set the investigation of State education agencies as a priority under Title IX enforcement.

CHAPTER II: BEYOND THE LEGAL IMPERATIVE

Administrative action to enforce the legal ban on sex discrimination is only the first step towards achieving equality for women in education. Over time, we must work for fundamental change throughout the education system. Ultimately, the fight for change must be won in every school district, in every college and university. In that struggle, the Federal government's principle contribution must be leadership, since government can directly affect only a small share of the Nation's education resources. We look then to HEW as a catalyst for change.

This chapter outlines the most important leadership roles HEW's "House of Education" should play: public education, helping students and teachers to explore new roles for both sexes, fostering new educational approaches and knowledge building. Finally, it lists the internal management changes the education agencies ought to make if they are serious about championing women's right to equal educational opportunities over the long term.

EDUCATING THE PUBLIC

There is remarkably little understanding, either in the education community or in the public at large, of the serious barriers to equality women face today throughout education. If education institutions all around the country are to begin removing those barriers, many more people--inside the education system and out--will have to appreciate the problem.

The Assistant Secretary for Education and the agencies reporting to him have substantial public information resources at their command. Through press releases and reports, articles and films, program and public affairs staff generate a steady flow of information on education issues of national importance. Top agency officials are constantly in demand for speeches and other public appearances; both the Commissioner and his Deputies had extensive speaking schedules last year.

All of these information resources can be put to work building public awareness of the inequalities women experience in education. In OE, a few efforts have already been made:

-- The Commissioner early in 1972 issued a strong statement on the educational rights of pregnant students. He said:

> Every girl in the United States has a right to and a need for the education that will help her prepare herself for a career, for family life, and for citizenship. To be married or pregnant is not sufficient cause to deprive her of an education and the opportunity to become a contributing member of society.[14]

> The U.S. Office of Education strongly urges school systems to provide continuing education for girls who become pregnant. Most pregnant girls are physically able to remain in their regular classes during most of their pregnancy. Any decision to modify a pregnant girl's school program should be made only after consulting with the girl, her parents, or her husband if she is married, and the appropriate educational, medical, and social service authorities.

> Further, local school systems have an obligation to cooperate with such other State, county, and city agencies as health and welfare departments and with private agencies and physicians to assure that pregnant girls receive proper medical, psychological, and social services during pregnancy and for as long as needed thereafter.
>
> The needs of pregnant girls are but one aspect of our concern. Young fathers also require assistance to enable them to meet the considerable responsibilities which they have assumed. We shall continue to emphasize in all aspects of our concept of comprehensive programs for school-age parents, the problems, the needs, the resources, the processes, and the program activities which will serve both young women and young men experiencing or anticipating early parenthood. In so doing, we also serve the children involved, and intend to promote a more successful "services integration model" for them--a strengthened family structure.

-- OE just sponsored a conference on sex role stereotypes in the schools, held Thanksgiving weekend, 1972. Conducted by the National Education Association, the conference attracted participants from various segments of the education community and the concerned public.

-- The agency is sponsoring a portable exhibit on school-aged parents, dramatizing the problems these young women face and the need for services to parents of both sexes.

-- The December 1972 issue of American Education, OE's own mass circulation magazine, carries a lead article on the laws banning sex discrimination in Federally-funded programs.

These are excellent initial efforts, yet the Education Division has barely begun to use the public information resources it has available. The Commissioner delivered 35 major addresses over the last school year, the Deputies among them many more. However, no top agency official has ever delivered a speech whose primary focus was a fundamental civil rights issue affecting half the population: equality for women.15

Top level leadership is needed to emphasize the seriousness of the inequities facing women in education. In addition, OE, NIE and the Assistant Secretary should use other media at their command to increase public awareness.

RECOMMENDATIONS

Educating the Public

15. We recommend that the Assistant Secretary for Education, the Commissioner of Education, the Director of NIE and their respective Deputies should arrange to speak before key national education groups on their responsibilities for ending discriminatory practices. For example, we suggest that:

    a. The Assistant Secretary for Education or the Commissioner of Education address a conference of the major book publishing associations on OE's concern with sex stereotyping in educational materials and its effect on the status of women in education.

    b. The Director of NIE's Career Education Task Force and the Deputy Commissioner for Occupational and Adult Education speak before the American Vocational Association and other key vocational groups on the need to encourage young men and women to explore the entire range of vocational opportunities.

    c. The Assistant Secretary for Education or the Commissioner of Education discuss the detrimental effects of inadequate counseling on lowering female career aspirations before the national meetings of secondary school counselors.

16. We recommend that the Office of Public Affairs use the range of media at its disposal to expand public consciousness of the growing struggle among women to secure equal opportunities in education. Specifically, we recommend that:

    a. OPA work with program officials to produce a documentary film for public distribution on ways education can help women to break traditional sex barriers in various occupations at all levels.

b. OPA organize an exhibit on women and sex discrimination in education for use at education conferences and at gatherings of women's rights groups. The exhibit might premiere in the Office of Education's main lobby, and focus particularly on Title IX, sexism in career training, and sex stereotyping in elementary school curricula.

c. In cooperation with the Office for Civil Rights in HEW, OPA develop and disseminate a pamphlet to the general public on laws protecting women's rights to equal opportunities in education.

d. American Education continue to publish articles to be made available in reprint form on the roles and progress of women in education.

EXPLORING NEW ROLES FOR WOMEN AND MEN

If schools are to take the mandate to eliminate sex biases seriously, they will have to discard many outdated attitudes, practices, and educational tools. Teaching techniques, textbooks, films, and guidance tests will all need basic revisions.

Unless OE and NIE take the initiative in developing replacements for these antiquated teaching tools, educators will have nowhere to turn when they begin trying to overcome sex biases in the classroom.

Accepting the challenge will mean much more than merely producing neutral materials. It will demand new materials and learning approaches which explicitly address the problems of sexism and help teachers and students to cope with them.

The task force unearthed only one instance where OE has supported this kind of initiative--A curriculum unit designed to dispel traditional myths about women's roles in the work force. Aimed at secondary school girls, the unit provided students with information on occupations and on women's expanding role in the work force. Unfortunately, the Ohio State Center for Vocational and Technical Education produced this unit quite independently of the curriculum development for the school-based career education model. The Center has not yet adapted it or any other materials like it for inclusion in career education curriculums.

OE and NIE should continue supporting the development and dissemination of materials to help boys and girls understand the right of women to equal vocational opportunities and the underlying causes of job discrimination. At the same time, they should see that all model career education programs include components on the role of women in the work force.

In addition, OE and NIE should focus development and dissemination resources on curriculum and guidance materials which encourage students of both sexes to explore new roles, and on teacher training materials which aim to help teachers avoid biases in their dealings with students. To assist educators, teachers and citizens concerned about sexism in the present curriculum, OE should disseminate a bibliography of unsex-biased curriculum materials.

RECOMMENDATIONS

Exploring New Roles for Women and Men

17. We recommend that OE and NIE foster educational approaches which encourage children of both sexes to explore new roles. Specifically, we recommend that:

    a. OE and NIE fund the development of educational and guidance techniques and materials designed to encourage students to explore new roles, particularly in educational areas where sex discrimination is especially strong, as in career education and guidance testing.

    b. OE support the development and dissemination of teacher training materials on avoiding sex biases. In addition, we recommend that OE and NIE personnel training program guidelines be amended to encourage projects to include training in overcoming sex biases.

    c. OE develop and disseminate a bibliography of unsex-biased materials appropriate for school use, especially at the elementary and secondary levels.

    d. OE and NIE insure that all model and exemplary career education projects include instruction that explicitly addresses the problems of sex-stereotyped occupations and dispels myths about women in the work force.

SERVING WOMEN'S SPECIAL NEEDS

No one should be denied an education simply because she--or he--has chosen to raise a family.

Yet, education is out of reach for many women with family responsibilities not because of active sex discrimination--but because educational institutions do not provide the special services these women need to pursue education or training.

These problems, already summarized in Part I, are not susceptible to enforcement measures. Positive, not punitive action is called for to secure special services and new educational improvements compatible with these women's needs. With a modest redirection of resources, OE and NIE can do a great deal to expand educational opportunities for women with families.

Action to Date

OE-NIE programs have supported scattered efforts to open up education to women with special needs:

-- The home/community-based career education model, mentioned above, will use the mass media to help unemployed adults in the home (chiefly women), take advantage of community career education resources. NIE is now funding the model's development.

-- The Adult Education Program offers part-time basic education. One project, "Armchair Education," reaches into the home to motivate prospective students to take advantage of educational and other community resources.

-- Title I of the Higher Education Act supports several projects serving women seeking continuing education and training. Eight projects funded in FY 1971 offered counseling services and skill training to women reentering the work force. However, these efforts remain limited, and projects have not been evaluated for their effectiveness in meeting women's needs.

-- Local school districts have opted to use funds from several programs for special projects for school-aged parents. In addition, OE is lead agency for a standing Interagency Task Force on Comprehensive Programs for School-Aged Parents, whose mission is to marshall Federal resources for teen-age parents.

Next Steps

OE and NIE can do much more in using existing program resources to promote expanded educational opportunities for women--and men--for whom raising a family create special difficulties. The two agencies, along with the Fund for Improvement of Postsecondary Education, should act now on several fronts.

Child Care. Currently, no OE programs specifically authorize program funds for child care, although it is possible that some program funds such as ESEA, Title I, are supporting student day care services at local option. Title I and the Follow Through program will pay for babysitting costs necessary for parental participation, but this is the closest OE has come to actively offering the child care assistance needed to enable parents to participate in an agency program.

Spending program funds for child care is not a new idea. Most of the Federal poverty-oriented training programs--including WIN, Job Corps, JOBS, Neighborhood Youth Corps, Public Service Careers, and the Concentrated Employment Program--permit grantees to pay for trainee child care.

We urge that OE permit local projects to use program funds to help needy parents shoulder child care costs on a sliding income scale, either by providing child care services or through payments for such services. Although we don't expect this option would be used widely, it would permit program staff to use funds for that purpose should the need arise.

Serving School-Aged Parents. OE's efforts on behalf of these young people have had several shortcomings. First, special projects funded by OE often segregate pregnant students in special classes, whether or not they prefer regular classroom instruction. Second, in the program with the biggest stake in keeping school-aged mothers in school, Dropout Prevention, only three out of 21 projects have components serving pregnant students. Third, except for these three projects, OE has not supported interagency efforts to focus HEW resources on school-aged parents by setting aside discretionary funds for that purpose. OE should assure that its initial commitment to serving these young people is carried out by identifying specific program resources to be used.

Part-time Study. Because OE and NIE programs mirror existing practices in recipient institutions and because program administrators may not appreciate the demand for part-time study, projects we assist usually conform to traditional full-time education patterns. OE-and NIE-funded vocational and graduate education programs are mainly full-time.

OE and NIE can use their service and training programs as leverage to expand part-time opportunities throughout the education system by requiring that all such projects make provision for part-time students.

Recent changes in student aid legislation may make it easier for women to secure an equal share of Federal student financial aid. P.L. 92-318 opened all student aid programs to students attending school at least half-time. If this authority is used, it could benefit women with children who seek higher education on a part-time basis. Student aid officers may be reluctant to aid part-time students, however, and OE should encourage these officers to make full use of the new authority.

Accommodating Other Programs to the Special Needs of Women. OE and NIE should identify women wishing to continue education or training as a special target group in programs currently serving adults: not only in adult education, but also in personnel training, manpower training and postsecondary education programs. Women with family responsibilities have been largely excluded from these programs, and only a visible emphasis on projects serving their needs is likely to produce different results.

Two new program authorities are particularly well suited to reaching this population. P.L. 92-318 authorized the creation of Educational Opportunity Centers serving low-income areas, to provide information on student financial aid, help in applying to institutions of postsecondary education, counseling and tutorial services. For women cut off from the usual sources of information and advice on student aid opportunities, these centers could be an invaluable source of information. The same law also authorizes a ten percent discretionary set-aside of the HEA Title I Community Service and Continuing Education Program for special projects exploring solutions to problems of social change. These funds should be targeted on developing model programs for women returning to education and work.

The Office of Public Affairs program for disseminating information to the public on priority education issues could be extremely useful in reaching women in the home with relevant information on education and training. For example, OPA has been distributing "25 Technical Careers You Can Learn in 2 Years or Less" as part of a career education effort. The Office can use similar techniques to reach women--with

information, for instance, about student aid and about exploring the types of occupations now opening up to women. The Women's Bureau in the Department of Labor has put out an excellent series of pamphlets designed to do just that ("Why not be an Engineer?"); such materials could be used in an OE information campaign aimed particularly at younger women.

Finally, experimentation with entirely new approaches to education responsive to life styles of women raising families is sorely needed. The home/community-based career education model is one step; others are needed to meet the needs of women getting an academic education of various kinds. The Fund for the Improvement of Postsecondary Education, NIE, and OE have complementary responsibilities for fostering major educational change. They should be working together to see that education begins to serve the long neglected population of women who want both a family and more education.

RECOMMENDATIONS

Child Care and Serving School-Aged Parents

18. We recommend that OE, NIE encourage educational institutions to provide opportunities for parents raising children to pursue their education. Specifically, we recommend that:

    a. Day care be made an allowable cost in all programs (including construction programs) serving people of child-bearing age. OE should recommend new legislation where program guidelines cannot accomplish this.

    b. OE set aside at least two million dollars from discretionary monies for projects to support the work of the Interagency Task Force on Comprehensive Programs for School-Aged Parents.

Part-Time Study

19. We recommend that OE and NIE promote part-time study opportunities for women returning to education. Specifically, we recommend that:

    a. OE and NIE insure that part-time students are admitted to projects funded under postsecondary and other programs serving adults. OE should recommend legislation to accomplish this where it cannot be achieved through guideline changes.

b. Student aid program guidelines urge institutions to make Federal financial aid available to half-time students in proportion to their enrollment in the student body.

Accommodating Other Programs to the Special Needs of Women

20. We recommend that OE and NIE guidelines for programs aimed at adults state that projects serving women wishing to continue their education be given special consideration. In addition, the Educational Opportunity Centers established under P.L. 92-318 should identify this population as a special target group, and Title I of the Higher Education Act should use its discretionary set-aside to fund model programs serving this group.

21. We recommend that the Office of Public Affairs undertake a public service information campaign publicizing new opportunities for women in education through radio and television spots as well as through printed materials. For example, we suggest that:

a. OE make use of the excellent materials already developed by the Women's Bureau at the Department of Labor to encourage young women to enter male-dominated professions, and cooperate with the Women's Bureau in developing new materials.

b. OE direct information on student financial aid to women in the home who plan to return to education or employment training after several years' absence.

22. We recommend that OE, NIE and The Fund for the Improvement of Postsecondary Education experiment with new educational approaches with a potential for expanding opportunities for women in both academic and vocational education.

BUILDING OUR STORE OF KNOWLEDGE ON WOMEN IN EDUCATION

At the national level, OE and NIE bear chief responsibility for building our store of knowledge about women in education in the United States. Between them, the two agencies should be gathering national statistics on the status of women as students and employees in the education system, evaluating the impact of OE and NIE programs on women and supporting research on sex role development and sex discrimination.

Collection and dissemination of educational statistics have been part of OE's basic mandate since its creation in 1867. With the enactment of the Cooperative Research Act, OE also took on responsibility for supporting research and development in education. This year OE turned responsibility for educational research and development over to the National Institute of Education.

Collecting Information

With respect to collecting information on women, OE has not fulfilled its oldest mandate. Despite growing concern about sex discrimination, information comparing the status of men and women in education is still limited. Few national statistics have been collected to supplement piecemeal information on sex discrimination that has come to light in recent years. In addition, OE has gathered only scattered information on the status of women in its own programs.

Accurate information on women in education is essential to education policy makers and interested citizens in determining the extent and degree of sex discrimination supported by our educational institutions. In turn, agency officials will find it difficult to identify and overcome sex discrimination in their own programs without accurate information on their impact on women.

National Statistics. OE does collect a wealth of national statistics on education, most gathered by the National Center for Educational Statistics (NCES). Over the last year and a half, NCES has moved to collect more information comparing men and women, so that now 25 out of 55 of their surveys collect data by sex.

While it is encouraging that NCES is beginning to recognize the need to increase its store of data by sex, these efforts will not satisfy the need for information on women in education. Data on the salary, education and employment histories of staff in elementary and secondary schools need to be collected by sex, as well as information on the number of single sex vocational schools. These are just two examples: information on comparing the participation of males and females throughout the education system is needed to improve our ability to assess progress toward equality for women.

Adding new sex breakdowns to current surveys will cost money and demand more effort from our educational institutions. However, this is a small price for information which is essential to solving basic inequalities between the sexes.

Program Data. OE and NIE do not systematically collect statistics on the impact of their programs on men and women. Many programs collect no data on the number of participants by sex, even in areas where sex biases may be expected, such as in several of our vocational education programs.

In addition, programs which accept applications from individuals, such as fellowship and student aid programs, collect no data on the number of applicants by sex. Nor do they record the amount of award by sex, despite the ETS finding that women do receive smaller awards under student aid programs.

Information on women in the administration of project grant programs is even harder to come by; programs rarely have data on project staff below the level of project director by sex. In fact, a sex breakdown on project directors themselves can only be obtained by counting male and female names, a highly unscientific method. The situation is similar in State grant programs: usually only the State program coordinator's name is known; data on the proportion of females on the State staff are not collected.

Evaluation

Besides collecting basic statistics on women in agency programs, OE and NIE should begin to use formal evaluations to assess program impact on women. Many of OE's evaluations do collect data by sex, since evaluators expect programs to have different effects for male and female participants.

However, when evaluators find differences in a program's effect on males and females, they do not explore the reasons and can offer no advice to administrators on changing the program to balance its effect on the sexes.

This fall, the Office of Education and the Department of Labor are cooperating on an evaluation of MDTA training programs on women. The study is designed to examine the effectiveness of MDTA in preparing women for entry and re-entry jobs in the labor market. It will serve as a model of the thorough evaluations we should be funding on the effectiveness of OE programs in meeting women's needs. It will analyze sex stereotyping in the training courses, obstacles to equal opportunities for women and means of expanding opportunities for women in the program.

Similar studies on other OE programs would be extremely helpful. We would particularly encourage the Office of Planning, Budgeting and Evaluation (OPBE) to fund follow-up and longitudinal studies showing the long-range impact of programs on women and men.

Research Studies

On the whole, OE has supported little research shedding new light on problems of inequality between the sexes. Studies have been funded more by accident than conscious policy. A few researchers have requested funds for small studies and have been funded, but OE has made no effort to assess the need for research in this area and to see that it gets done.

The one major study to date was funded by the Office of the Secretary but administered by OE: a study on "Barriers to Women's Participation in Postsecondary Education." Still in the pilot phase, the study has run into a number of difficulties and has been delayed a year. Unfortunately, the present study design does not provide a control group of men, so that the study cannot produce information comparing the needs of men and women.

As we noted earlier, a great deal of research must be done to lay the solid groundwork for long-term progress towards equality for women. OE should build on the work already begun in the "barriers" study. We do suggest that a male control group be added and that OE undertake a similar study on the educational problems of women who are not high school graduates.

NIE must take the lead in focusing research resources on the problem of inequality between the sexes. In authorizing the new Institute's creation, Congress spelled out its foremost concern: providing "every person an equal opportunity to receive an education of high quality regardless of his race, color, religion, sex, national origin or social class."16 As Congress recognized, unequal opportunity for women is among education's most serious problems. We urge NIE to heed its mandate to deal with the problem by undertaking a coordinated research and development effort aimed at improving opportunities for women. As part of that effort, NIE should be sure to explore the impact of schooling on sex-stereotyped career goals and the extent of sex bias in guidance testing.

Reporting and Disseminating Information

Building our information store on women in education will have limited impact unless OE and NIE begin to report and disseminate that information much more effectively than they do now. OE does not report or disseminate the information it now has on women in useful form--either national education statistics or data on how women fare under OE programs. As a result, the information we do have is inaccessible both to education policy makers at all levels of government and to the concerned public.

Both national statistics and evaluation results comparing males and females, when collected, are scattered throughout long reports and difficult to find. Were OE to collect sex breakdowns on teaching staff at all levels in education, given the way statistics are reported now, one would need to refer to three

separate reports to compare women's participation at all levels. The time lag between data collection and publication is another problem: the Office for Civil Rights has to collect its own statistics on minority enrollments in institutions at all levels since NCES could not guarantee to make data available the same year it is collected.

In only one area of reporting--ERIC, the information retrieval system for research reports and other education documents--has an attempt been made to report materials on women in a useful form. Several ERIC categories (descriptors) used to call up information apply to women, including a new one on women's studies. ERIC clearinghouses have compiled several bibliographies and research reviews concerned with women. The higher education clearinghouse has put out a report on women's rights on the campus; the clearinghouse on the disadvantaged just released a bibliography on women's educational and career roles. These efforts will be most helpful and we urge ERIC staff in NIE to press clearinghouses to produce more of the same.

To improve reporting and dissemination of existing information on men and women in education, we urge several steps. NCES should begin to publish comparative statistics on the sexes as separate reports; it should also devote special sections of its larger reports to data by sex. Program and evaluation data on women in OE programs should be highlighted in separate sections of program and evaluation reports. Finally, NIE's dissemination staff should make women and sex bias a major focus of the targeted communications program, which summarizes research on a subject for wide distribution within the education community.

RECOMMENDATIONS

National Statistics

23. We recommend that NCES amend its present surveys to collect the following data by sex:

    a. A breakdown by sex for elementary school pupils in each grade, to be added to the ELSEGIS State Fall Report on Staff and Pupils.

    b. Secondary school subject area enrollments by sex, to be added to the ELSEGIS Survey of Secondary School Offerings, Enrollments and Curriculum Practices 1972-73.

c. All data on elementary school principals and on the number of specialists by sex, to be collected in the Belmont Elementary School Survey. This survey's questionnaire on teacher characteristics is thorough and should be used as a model for collecting information isolating sex as a variable.

NOTE: Data by sex in characteristics of all school staff are needed to determine whether women remain at lower positions with lower pay despite equivalent or better qualifications than the male staff.

d. Secondary school staff and principal data by sex, to be collected in the Belmont Secondary School Survey. We urge that the staff and school questionnaires be expanded to collect by sex the same information as the Elementary School Survey collects on elementary school staff (e.g., salary, years of teaching experience, degrees earned, etc.).

NOTE: No data on characteristics of teaching or administrative staff in secondary schools are currently collected at all, much less by sex, so that OE has no information on the status of women in secondary schools.

e. The number and salary distribution by sex of tenured higher education faculty, to be added to the HEGIS Employees in Higher Education survey. In addition, NCES should make an effort to provide HEGIS salary data to OCR in a timely fashion for use in enforcing Title IX and Executive Order 11246.

f. The age distribution for men and women by field and degree conferred, to be added to the HEGIS Earned Degrees and Other Formal Awards Conferred survey.

NOTE: Such data would indicate the extent to which men and women interrupt their education and at what age, and will provide an estimate of the length of interruption by level and academic field.

g. Enrollment data for adult and continuing education by sex to be collected in the Adult and Continuing Education in Institutions of Higher Education survey.

h. All data on adult basic education staff and participants to be collected in the Adult Basic Education survey (based on the annual reports submitted by States).

i. Vocational education enrollment data by sex for each institution to be collected in the Vocational Education Directories.

NOTE: These data would indicate what types of vocational schools (including area vocational schools) operate as single sex institutions.

j. Data by sex on library staff by level to be collected in the library and museum surveys (Public Library Survey, Federal Library Survey, Museum Survey and School Library Survey).

Program Data

24. We recommend that OE and NIE collect and report to the public basic data on all programs by sex. Specifically, we recommend that:

a. Programs serving a student clientele collect program participant data by sex.

b. Discretionary programs collect and update information on sex and salary of top project staff quarterly.

NOTE: All staff information could be collected by the PGIS system, on the procurement cover sheet (PCS). No commitment action should be made until all information is entered.

c. All programs prepare descriptive summaries of projects designed to improve educational opportunities for women.

d. Fellowship and training programs collect data on the number of applicants by sex.

e. The student financial aid programs should collect data on the amount of aid and number of grants by sex. In addition, data by sex on the guaranteed loan

program should include the number and amount of loans recommended by student financial aid officers.

NOTE: Under P.L. 92-318, student financial aid officers for the first time must certify the amount of a student's financial need before a bank can make a guaranteed loan.

Evaluation

25. We recommend that all OE-and NIE-sponsored evaluations include analyses of the presence, causes and impact of sex discrimination in each of the program or educational areas being studied. For many program areas, particularly fellowship and training programs, expanded follow-up studies of participants by sex will be required.

Research Studies

26. We recommend that OE and NIE support a series of studies on sex role development and sex discrimination in education. Specifically, we recommend that:

    a. NIE review existing research on the development of sex roles and self image and support a series of research and development efforts designed to fill the gaps in current knowledge of this topic.

    b. OE or NIE support a study on how the attitudes of counselors, teachers, administrators, parents and peers affect career plans and expectations of women and men, with a separate analysis of sexism in guidance tests.

    c. The full-scale study resulting from the pilot study, Barriers to Women's Participation in Postsecondary Education, be broadened to include a representative sample of males as a comparison group.

    d. OE support a study of the barriers female and male non-high school graduates face in acquiring additional education and training.

Reporting and Disseminating Information

27. We recommend that OE and NIE expand efforts to report and disseminate information on women in education. Specifically, we recommend that:

    a. NCES publish, at least annually, special mini-reports and projections on the relative status of women and men in education, both as students and employees. In addition, NCES' regular reports should include separate chapters comparing data on men and women.

    b. Program data appearing in annual reports include participant data by sex.

    c. OPBE and its equivalent in NIE include in their evaluation and planning studies special sections on the impact of programs on the sexes.

PUTTING OUR OWN HOUSE IN ORDER

The recommendations found in the preceeding pages touch upon some one hundred OE-and NIE-administered programs. These cannot be implemented effectively, nor can a long-term commitment to equal opportunity for women be sustained without some important management adjustments in OE and NIE. Lasting changes are unlikely unless:

-- agency heads make it clear to staff that educational equality for women has priority status and that funds will be committed to fostering it.

-- program staff themselves are educated about sex discrimination.

-- a permanent women's office staff monitors changes and explores new strategies.

-- women and men share equally in agency decision making.

Equality for Women as a Priority

Equality for women in education should be identified as a priority at the Assistant Secretary or Commissioner/Director level, with recommended action steps carried out through the Operational Planning System or its equivalent at NIE.

Putting equal opportunities "up front" as an agency priority is the key to the Assistant Secretary's leadership. As a major civil rights issue affecting over half our population, equal opportunity for women is as pressing and important as current agency priorities.

Throughout the agencies, the task force found little understanding of the educational inequalities women face and limited awareness of the Assistant Secretary's concern. Since program officials do respond to top-level priorities, a forceful mandate from the Assistant Secretary and from the agency heads is essential. Unless equal opportunity for women is made a priority, neither agency is likely to sustain major changes. In addition, several programs that could contribute (e.g., public affairs and targeted communications) deal only with priority areas.

Through OE's Operational Planning System, the Deputy Commissioners specify and report on steps to implement goals reflecting the Commissioner's priorities. Presumably, NIE will develop its own system for tracking objectives. Given the number and extent of changes we believe OE and NIE should make, a formal system is needed to articulate and track objectives concerning equal opportunity for women.

It is unlikely that a significant amount of resources will be devoted to projects aimed at improving opportunities for women without specific commitments by the Commissioner and the Director of NIE. Specific program funds should be targeted on advancing women in educational administration; on developing unbiased curriculum and guidance materials; on breaking down occupational stereotypes; and on building opportunities for those returning to school or work. Since Title IX of P.L. 92-318 amended Title IV of the Civil Rights Act, funds should also assist sex-segregated schools in desegregating.

OE and NIE should not simply fund projects offering special services to women; they should focus program resources on projects exerting leverage for change in the way the education system itself treats women. Basically, women suffer unequal treatment in education--not through some fault of their own--but because of discrimination and inflexibilities within our system of education. Projects addressing that problem directly will be the most significant ones in the long run, and program staff should consider that when deciding how agency funds can best serve women.

We decided against recommending specific legislation such as the "Women's Education Act" (H.R. 14451), which authorizes funds for research and demonstrations, curriculum development, tests, guidance programs, teacher training and so on. All of these activities are badly needed, but could be supported under existing legislation. HEW should take the initiative on this issue, rather than wait for a specific authorization. If, in the end, HEW does not commit existing resources to promote educational equality for women, women's rights organizations will be justified in pushing for legislation to accomplish this.

Staff Education

"I've spent a lot of time in universities and I know there isn't any discrimination there." If our conversations with program staff indicate prevailing attitudes, OE and NIE staff are generally unaware of sex discrimination in education. Few people knew about Title IX and few knew that Federal contractors are forbidden to discriminate in employment.

Although sex discrimination in education has only recently attracted attention, OE and NIE can no longer afford to be ignorant or unconcerned. Sex discrimination in education is virtually universal and deeply entrenched. Now it is also illegal. Agency personnel must understand both the nature and effects of sex discrimination and their responsibilities under the antidiscrimination laws. They should also understand that personal prejudices against women may influence program decisions.

Women's Action Office and Advisors

The Commissioner and NIE's Director will need a continuing assessment of each agency's progress toward equal opportunities for women as well as advice on necessary next steps to follow. The OE Federal Women's Program Coordinator shoulders some responsibility for OE programs, but as the equal employment officer for women, she must devote most of her energies to internal employment problems. She has not been given the staff she needs to do that job in depth, much less take an active role in program policies affecting women.

OE and NIE should each establish an office to oversee efforts to secure opportunity for women within the agencies and in education at large. These offices must have the responsibility, the authority and sufficient staff to do the job. They must also be concerned with sex biases in agency employment, since internal discriminatory practices affect program policy decisions. These offices should also function as a clearinghouse on discrimination against women.

To supplement the work of the Women's Action Office, each deputyship in OE and equivalent unit in NIE should have its own Advisors. Since the Women's Action Office would provide a strong and active focus for women's equality, it will need continuing sources of information and assistance on employment and program developments throughout the agency. The units in OE and NIE will also need easily accessible advice and assistance to help them define and assume their specific responsibilities to women. Women's Action Advisors, representing all grades and the various minorities, would serve both functions.

Women and Educational Policy Making

Our mandate has been to define the impact of our programs on women outside the agency. We have not studied the effects of OE and NIE employment practices on women, nor do we feel qualified to make specific recommendations.

However, decision making in the Division of Education is thoroughly dominated by men: with rare exceptions, line decision-makers from Assistant Secretary to branch chief are men. While one does not have to be female to care about equality for women, an agency essentially run by men cannot be expected to demonstrate sensitivity in assuring equity for women in its programs. The agency's effectiveness in promoting opportunities for women throughout education will be undermined if it does not begin to practice what it preaches.

Office of Education Policy Makers. While the average grade for women in the Office of Education is GS-7, the average grade for men is a whopping GS-14. Women in OE are:

-- 54 percent of the employees;
-- 18.8 percent of those in GS-13 to GS-15; and
-- 5.7 percent of those in GS-16 to GS-18.

The following table indicates the disparities:

Office of Education Full-Time Professional Staff, Grades 13-18
October 30, 1972

Grade	Total	No. of Men	No. of Women	Percentage of Women
18	4	4	0	0
17	13	11	2	15
16	35	34	1	3
15	276	253	23	8
14	474	387	87	18
13	417	307	110	26

Nor has the situation improved over the last few years. Over a year ago, another OE task force reported on employment biases against women--tangible gains have not followed. A few women have been brought in to head small program or staff offices, yet dozens of extremely competent mid-level women continue to be passed over for supervisory and decision-making positions.

Affirmative action goals for women have been set so low that they do not even compensate for normal attrition. In the face of a goal to add 18 women to grades 13-15, the record shows a net loss of six women in these grades between July 1, 1971 and September 30, 1972.[17] Even if there were no attrition and the agency hired only women in GS 13-15, at the rate of 18 additional women a year it would still take 40 years to bring women to one-half the employees in these grades.

The affirmative action system has no teeth--supervisors are not held accountable for progress in equal employment. Most selecting officers go through the motions of the merit promotion procedures: women are frequently candidates for senior-level jobs, but rarely the final choice.

Tight budgets and hiring freezes notwithstanding, the agency has hired from the outside. Men continue to be hired at higher levels than women. For example, 11 senior-level professionals were hired in a 4-month period this year: 7 men, 4 women. All the women were hired at GS-13, lowest step; three of the men were hired at GS-14 and GS-15; a fourth at GS-13, step 8; and the other three were GS-13, step 1.

National Institute of Education Policy Makers. Proportions of women in senior levels are no better at the National Institute of Education.

National Institute of Education Full-Time Professional Staff, Grades 13-15
October 30, 1972

Grade	Total	No. of Men	No. of Women	Percentage of Women
15	20	19	1	5
14	23	21	2	9
13	26	12	14	55

NOTE: As of October 30, 1972, no supergrades were on board as regular NIE employees.

All of the five supergrade employees (GS-16 to GS-18) detailed to NIE as of October 30 were male. As this report is completed, NIE is staffing up to full operation. The Institute has its best opportunity right now to right an already serious imbalance in decision-making positions. If hiring continues to favor men at the top levels, however, a bias against women will be built into the structure for some time to come.

Special Policy Positions. For special policy positions--on advisory councils, task forces and review panels--the Office of Education's record is just as poor. OE has 22 advisory committees with a total of 355 authorized positions. As of October 30, 1972, only 58 (28.4 percent) of 204 current appointees are women. For the 16 councils appointed by the Secretary, membership overall is 30.7 percent female. For councils appointed by the President, women are only 25 percent of the members. Although HEW has set council goals for women, recent appointments continue to show the same imbalances.

The record of participation by women on internal agency task forces is no better. Few are chaired by women. In the Bureau of Higher Education, for example, only 2 of the 10 new task forces created in the early summer of 1972 were chaired by women. Of 64 participants appointed in June, only 10 were women.

Field readers play a major role in program decisions, since they review and assess project proposals. Of 52 programs which reported using field readers, in only 15 were women at least 25 percent of any review panel. This is particularly inexcusable in areas of education where women are plentiful. The selection process for field readers and consultants may explain the imbalances: widespread use of personal contacts among the predominantly male staff and informal advice from male-dominated professional associations precludes an even chance for women.

Another form of discrimination among these people is in pay. While field readers receive a standard fee for their work, consultant compensation is flexible and compounds the effects of past employment discrimination for many women. Since consultant fees are often gauged to past salary and title, women who have been denied equal advancement opportunities are paid less than men whose professional lives bear no such handicap.

Women are a majority of the general population and 40 percent of the working population. Increasing numbers of women with lifelong occupational aspirations are entering the work force as professionals. Yet in the education agencies, decision-making continues to be monopolized by men; women generally stop advancing at GS-12 or GS-13.

The Office of Education and the National Institute of Education have the opportunity to exert leadership in affording women an equal chance--through their influence, through their initiatives and through their programs. They must begin, however, by putting their own houses in order.

Equality for Women as a Priority

28. We recommend that equality for the sexes in education be declared an official priority of both OE and NIE. In line with that priority, we recommend that:

    a. Implementation of recommendations be tracked through the Operational Planning System at the Assistant Secretary or Commissioner/Director level.

    b. At least 10 percent of the appropriations for the following programs be spent on projects which make a special contribution to equal educational opportunity for women:

    Education Professions Development Act, Parts D, E and F
    Education for the Handicapped Act, Part D

    Funds could be used in projects which advance women in school administration, train teachers to avoid sex bias, train administrators on implementing Title IX and train teacher trainers to sensitize teachers to sex bias.

    Higher Education Act, Title II

    Funds could be used in projects which advance women in library administration, support workshops on unsexbiased materials and assist librarians in building collections relating to women's rights and women's issues.

    Vocational Education Act, Parts C, D and I

    Funds could be used in projects which study the obstacles to women's full participation in all areas of vocational education, demonstrate approaches to breaking down sex stereotypes in vocational education and develop curriculum materials which counteract career sex stereotypes.

    Fund for the Improvement of Postsecondary Education

    Funds could be used for experiments with new forms of education with a potential for expanding opportunities for women returning to education and training after several years' absence.

Civil Rights Act of 1964, Title IV

Funds would be used to assist sex-segregated schools in desegregation.

Staff Education

29. We recommend that OE and NIE undertake to educate their own staffs to avoid sex bias in agency operation and program management. Specifically, we recommend that:

    a. Briefings for all supervisory staff be conducted on the implications of Title IX and other sex discrimination legislation for OE's and NIE's program operations.

    b. OE and NIE arrange for training programs to create employee awareness of sex biases and their influences or the actions of employees.

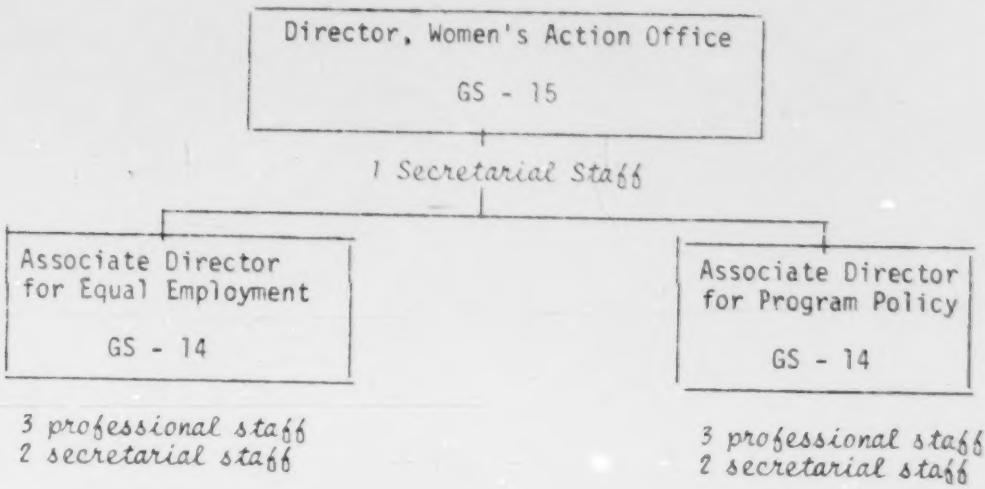
Women's Action Office and Advisors

30. We recommend that both OE and NIE establish a Women's Action Office to see that steps to improve the status of women both inside and outside the agency are carried out smoothly and expeditiously. Specifically, we recommend that:

    a. These offices serve as a continuing source of advice to the Commissioner and the Director on progress towards that goal and on new steps needed to help women secure equality in education and in the Federal education agencies.

    b. These offices report directly to the Assistant Commissioner for Special Concerns and an official of equivalent stature in NIE and absorb the functions of the Federal Women's Program Coordinator.

c. The following organization for the Women's Action Office be developed:



NIE would have a smaller staff consonant with the agency's present size.

31. We recommend that both OE and NIE convene an ad hoc committee by advertising for people interested in helping in the selection of the Director and Associate Directors of the Women's Action Offices. These ad hoc committees would be no more than 15 members, elected from among the original volunteers. These committees would draw up criteria for the selection of the Director and the Associate Directors and identify and recommend candidates to fill those positions. Upon final selection of candidates by the OE Commissioner and NIE Director, the responsibilities of the ad hoc committees would terminate.

32. We recommend that Women's Action Advisors be designated throughout the agencies to link program policies and employees with the work of the Women's Action Office. Specifically, we recommend that:

a. On a continuing basis, Advisors work with the Women's Action Office in carrying out their mission throughout the agencies by recommending priorities for action, reviewing program and employment activities affecting women and keeping communication channels open between program officials and the Women's Action Office.

b. Advisors be designated by the Directors of the respective Women's Action Offices.

c. Advisors be regular employees, released part-time from their regular duties.

d. Each OE Deputyship and equivalent in NIE have at least two Advisors, one for internal employment and one for programs. OE should have one Advisor concerned with employment for every 200 people in a deputyship, with the Office of the Commissioner combined with the Deputyship for Development. OE should have one Advisor concerned with program policy for every 200 people in the three program Deputyships and one Advisor for the two staff Deputyships. According to OE's current staffing, that would make a total of 24; NIE Advisors would be chosen in a comparable manner.

Special Policy Positions

33. We recommend that OE and NIE substantially increase the proportion of women advising on the operation of OE programs. Specifically, we recommend that:

a. All NIE and OE recommendations for advisory councils and special commissions aim to bring the proportion of women on each to 50 percent.

b. The same goal be set for the appointment of women to program review panels, outside evaluation teams, technical assistance personnel and consultants. Bureau chiefs should be responsible for approving these appointments to see that goals are being met. In addition, OE and NIE should adopt a standard fee for compensating consultants, regardless of salary, experience or other considerations.

c. Task forces be approximately 50 percent female. OE and NIE staff should avoid defining criteria for task force membership so that a predominance of men must be chosen. Bureau chiefs and Deputies should review and approve task force membership to see that goals are being met.

d. Bureau chiefs and Deputies report quarterly to the Commissioner of Education and to the Director of NIE on the male/female makeup of all review panels, outside evaluation teams, technical assistants, consultants and task forces.

FOOTNOTES

Part I

Sex Discrimination in Education: An Overview

1. National Organization for Women (N.O.W.), New York City Chapter, Education Committee, Report on Sex Bias in the Public Schools (New York, N.Y., 1971) p. 13 citing the study done by Elizabeth Hagan and the Central New Jersey Chapter of N.O.W.

2. Ibid., p. 15.

3. National Education Association (NEA) Research Division, Estimates of School Statistics, 1971-72 (Washington, D.C., 1971), p. 14.

   National Education Association Research Division, "Professional Women in Public Schools, 1970-71," NEA Research Bulletin, Vol. 49, No. 3 (October 1971), p. 68.

4. Education Commission of the States, National Assessment of Educational Progress: Assessment Reports No. 4, No. 5, No. 7, and No. 9 (Washington: U.S. Government Printing Office, 1970-71).

5. N.O.W., Report on Sex Bias..., p. 3.

6. Bureau of Educational and Vocational Guidance in cooperation with the Office of High Schools, The Public High Schools, New York City, 1971-72 (New York, N.Y.: Board of Education of the City of New York, 1972), pp. 18-23.

7. Gail Bryan, Discrimination on the Basis of Sex in Occupational Education in the Boston Public Schools, Prepared as part of an investigation by the Boston Commission to Improve the Status of Women, 1972, p. 6, n. 1. (Mimeographed.)

8. Ibid., p. 4.

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Part II

The HEW Mandate

1. Section 901 (a) of P.L. 92-318, the Education Amendments of 1972. See Appendix A for the full text.

2. Executive Order 11246 (30 F.R. 12319) was amended by Executive Order 11375 (32 F.R. 14303) on October 13, 1967, to cover sex discrimination. The amendment did not take effect until one year later, October 14, 1968. Revised Order No. 4 (36 F.R. 17789) followed in December 1971, to spell out contractors' affirmative action responsibilities. See Appendix A for the texts.

3. Section 901 of P.L. 92-318.

4. Olympus Research Corporation, Evaluation of the MDTA Institutional Individual Referral Program. Final Report 1972, Prepared for the Manpower Administration of the U.S. Department of Labor (Salt Lake City: Olympus Research Corporation, 1972), p. 14.

5. U.S. Department of Health, Education, and Welfare, Office of Education, Education and Training, 10th Annual Report to the Congress on Institutional Training under the Manpower Development and Training Act in 1971 (Washington: U.S. Government Printing Office, 1972). See Appendix C, Statistical Tables C-1, D-1.

6. U.S. Department of Health, Education, and Welfare, Office of Education, Education and Training, 9th Annual Report to the Congress on Institutional Training under the Manpower Development and Training Act in 1970 (Washington: U.S. Government Printing Office, 1971), p. 72.

7. The Pennsylvania State Advisory Council for Vocational Education, in cooperation with the National Association of State Directors of Vocational Education, A National Study to Identify Outstanding Programs in Vocational Education for Handicapped and Disadvantaged Students (Columbia, South Carolina: National Association of State Directors of Vocational Education, 1971).

8. Hackensack, New Jersey Public Schools, "Somewhere There's a Career Waiting for them. Will They be Ready for It?"

9. The "Action" workbook is part of the "Language and Thinking" curriculum developed by CEMREL under the educational laboratories and centers program now located in NIE.

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15. An aide to the Deputy Commissioner for Development did deliver a speech on his behalf last June, entitled "Barriers to Utilizing Women's Talents."

16. Section 405(a)(1) of the General Education Provisions Act, as amended by Section 301(a)(2), P.L. 92-318.

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APPENDIX A

SELECTED LAWS PERTAINING TO SEX DISCRIMINATION

TITLE IX—PROHIBITION OF SEX DISCRIMINATION

SEX DISCRIMINATION PROHIBITED

SEC. 901. (a) No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance, except that:

(1) in regard to admissions to educational institutions, this section shall apply only to institutions of vocational education, professional education, and graduate higher education, and to public institutions of undergraduate higher education;

(2) in regard to admissions to educational institutions, this section shall not apply (A) for one year from the date of enactment of this Act, nor for six years after such date in the case of an educational institution which has begun the process of changing from being an institution which admits only students of one sex to being an institution which admits students of both sexes, but only if it is carrying out a plan for such a change which is approved by the Commissioner of Education or (B) for seven years from the date an educational institution begins the process of changing from being an institution which admits only students of only one sex to being an institution which admits students of both sexes, but only if it is carrying out a plan for such a change which is approved by the Commissioner of Education, whichever is the later;

(3) this section shall not apply to an educational institution which is controlled by a religious organization if the application of this subsection would not be consistent with the religious tenets of such organization;

(4) this section shall not apply to an educational institution whose primary purpose is the training of individuals for the military services of the United States, or the merchant marine; and

(5) in regard to admissions this section shall not apply to any public institution of undergraduate higher education which is an institution that traditionally and continually from its establishment has had a policy of admitting only students of one sex.

(b) Nothing contained in subsection (a) of this section shall be interpreted to require any educational institution to grant preferential or disparate treatment to the members of one sex on account of an imbalance which may exist with respect to the total number or percentage of persons of that sex participating in or receiving the benefits of any federally supported program or activity, in comparison with the total number or percentage of persons of that sex in any community, State, section, or other area: *Provided*, That this subsection shall not be construed to prevent the consideration in any hearing or proceeding under this title of statistical evidence tending to show that such an imbalance exists with respect to the participation in or receipt of the benefits of, any such program or activity by the members of one sex.

(c) For purposes of this title an educational institution means any public or private preschool, elementary, or secondary school, or any institution of vocational, professional, or higher education, except that in the case of an educational institution composed of more than one school, college, or department which are administratively separate units, such term means each such school, college, or department.

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FEDERAL ADMINISTRATIVE ENFORCEMENT

SEC. 902. Each Federal department and agency which is empowered to extend Federal financial assistance to any education program or activity, by way of grant, loan, or contract other than a contract of insurance or guaranty, is authorized and directed to effectuate the provisions of section 901 with respect to such program or activity by issuing rules, regulations, or orders of general applicability which shall be consistent with achievement of the objectives of the statute authorizing the financial assistance in connection with which the action is taken. No such rule, regulation, or order shall become effective unless and until approved by the President. Compliance with any requirement adopted pursuant to this section may be effected (1) by the termination of or refusal to grant or to continue assistance under

such program or activity to any recipient as to whom there has been an express finding on the record, after opportunity for hearing, of a failure to comply with such requirement, but such termination or refusal shall be limited to the particular political entity, or part thereof, or other recipient as to whom such a finding has been made, and shall be limited in its effect to the particular program, or part thereof, in which such noncompliance has been so found, or (2) by any other means authorized by law: *Provided, however*, That no such action shall be taken until the department or agency concerned has advised the appropriate person or persons of the failure to comply with the requirement and has determined that compliance cannot be secured by voluntary means. In the case of any action terminating, or refusing to grant or continue, assistance because of failure to comply with a requirement imposed pursuant to this section, the head of the Federal department or agency shall file with the committees of the House and Senate having legislative jurisdiction over the program or activity involved a full written report of the circumstances and the grounds for such action. No such action shall become effective until thirty days have elapsed after the filing of such report.

JUDICIAL REVIEW

SEC. 903. Any department or agency action taken pursuant to section 1002 shall be subject to such judicial review as may otherwise be provided by law for similar action taken by such department or agency on other grounds. In the case of action, not otherwise subject to judicial review, terminating or refusing to grant or to continue financial assistance upon a finding of failure to comply with any requirement imposed pursuant to section 902, any person aggrieved (including any State or political subdivision thereof and any agency of either) may obtain judicial review of such action in accordance with chapter 7 of title 5, United States Code, and such action shall not be deemed committed to unreviewable agency discretion within the meaning of section 701 of that title.

PROHIBITION AGAINST DISCRIMINATION AGAINST THE BLIND

SEC. 904. No person in the United States shall, on the ground of blindness or severely impaired vision, be denied admission in any course of study by a recipient of Federal financial assistance for any education program or activity, but nothing herein shall be construed to require any such institution to provide any special services to such person because of his blindness or visual impairment.

EFFECT ON OTHER LAWS

SEC. 905. Nothing in this title shall add to or detract from any existing authority with respect to any program or activity under which Federal financial assistance is extended by way of a contract of insurance or guaranty.

AMENDMENTS TO OTHER LAWS

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SEC. 906. (a) Sections 401(b), 407(a)(2), 410, and 902 of the Civil Rights Act of 1964 (42 U.S.C. 2000c(b), 2000c–6(a)(2), 2000c–9, and 2000h–2) are each amended by inserting the word "sex" after the word "religion".

(b)(1) Section 13(a) of the Fair Labor Standards Act of 1938 (29 U.S.C. 213(a)) is amended by inserting after the words "the provisions of section 6" the following: "(except section 6(d) in the case of paragraph (1) of this subsection)".

(2) Paragraph (1) of subsection 3(r) of such Act (29 U.S.C. 203(r)(1)) is amended by deleting "an elementary or secondary school" and inserting in lieu thereof "a preschool, elementary or secondary school".

(3) Section 3(s)(4) of such Act (29 U.S.C. 203(s)(4)) is amended by deleting "an elementary or secondary school" and inserting in lieu thereof "a preschool, elementary or secondary school".

INTERPRETATION WITH RESPECT TO LIVING FACILITIES

SEC. 907. Notwithstanding anything to the contrary contained in this title, nothing contained herein shall be construed to prohibit any educational institution receiving funds under this Act, from maintaining separate living facilities for the different sexes.

Federal Employment and Employment by Federal Contractors

Executive Order 11375. October 13, 1967

AMENDING EXECUTIVE ORDER NO. 11246, RELATING TO EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of the United States Government to provide equal opportunity in Federal employment and in employment by Federal contractors on the basis of merit and without discrimination because of race, color, religion, sex or national origin.

The Congress, by enacting Title VII of the Civil Rights Act of 1964, enunciated a national policy of equal employment opportunity in private employment, without discrimination because of race, color, religion, sex or national origin.

Executive Order No. 11246 of September 24, 1965, carried forward a program of equal employment opportunity in Government employment, employment by Federal contractors and subcontractors and employment under Federally assisted construction contracts regardless of race, creed, color or national origin.

It is desirable that the equal employment opportunity programs provided for in Executive Order No. 11246 expressly embrace discrimination on account of sex.

NOW, THEREFORE, by virtue of the authority vested in me as President of the United States by the Constitution and statutes of the United States, it is ordered that Executive Order No. 11246 of September 24, 1965, be amended as follows:

(1) Section 101 of Part I, concerning nondiscrimination in Government employment, is revised to read as follows:

"SECTION 101. It is the policy of the Government of the United States to provide equal opportunity in Federal employment for all qualified persons, to prohibit discrimination in employment because of race, color, religion, sex or national origin, and to promote the full realization of equal employment opportunity through a positive, continuing program in each executive department and agency. The policy of equal opportunity applies to every aspect of Federal employment policy and practice."

(2) Section 104 of Part I is revised to read as follows:

"SECTION 104. The Civil Service Commission shall provide for the prompt, fair, and impartial consideration of all complaints of discrimination in Federal employment on the basis of race, color, religion, sex or national origin. Procedures for the consideration of complaints shall include at least one impartial review within the executive department or agency and shall provide for appeal to the Civil Service Commission."

(3) Section 202 of Part II, concerning nondiscrimination in employment by Government contractors and subcontractors, is revised to read as follows:

"(1) The contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, or national origin. The contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex or national origin. Such action shall include, but not be limited to the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.

"(2) The contractor will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex or national origin."

(4) Section 203(d) of Part II is revised to read as follows:

"(d) The contracting agency or the Secretary of Labor may direct that any bidder or prospective contractor or subcontractor shall submit, as part of his Compliance Report, a statement in writing, signed by an authorized officer or agent on behalf of any labor union or any agency referring workers or providing or supervising apprenticeship or other training, with which the bidder or prospective contractor deals, with supporting information, to the effect that the signer's practices and policies do not discriminate on the grounds of race, color, religion, sex or national origin, and that the signer either will affirmatively cooperate in the implementation of the policy and provisions of this order or that it consents and agrees that recruitment, employment, and the terms and conditions of employment under the proposed contract shall be in accordance with the purposes and provisions of the order. In the event that the union, or the agency shall refuse to execute such a statement, the Compliance Report shall so certify and set forth what efforts have been made to secure such a statement and such additional factual material as the contracting agency or the Secretary of Labor may require."

The amendments to Part I shall be effective 30 days after the date of this order. The amendments to Part II shall be effective one year after the date of this order.

LYNDON B. JOHNSON

The White House
October 13, 1967

[Filed with the Office of the Federal Register, 5:10 p.m., October 13, 1967]

EXECUTIVE ORDER 11246

EQUAL EMPLOYMENT OPPORTUNITY

Under and by virtue of the authority vested in me as President of the United States by the Constitution and statutes of the United States, it is ordered as follows:

PART I—NONDISCRIMINATION IN GOVERNMENT EMPLOYMENT

SECTION 101. It is the policy of the Government of the United States to provide equal opportunity in Federal employment for all qualified persons, to prohibit discrimination in employment because of race, creed, color, or national origin, and to promote the full realization of equal employment opportunity through a positive, continuing program in each executive department and agency. The policy of equal opportunity applies to every aspect of Federal employment policy and practice.

SEC. 102. The head of each executive department and agency shall establish and maintain a positive program of equal employment opportunity for all civilian employees and applicants for employment within his jurisdiction in accordance with the policy set forth in Section 101.

SEC. 103. The Civil Service Commission shall supervise and provide leadership and guidance in the conduct of equal employment opportunity programs for the civilian employees of and applications for employment within the executive departments and agencies and shall review agency program accomplishments periodically. In order to facilitate the achievement of a model program for equal employment opportunity in the Federal service, the Commission may consult from time to time with such individuals, groups, or organizations as may be of assistance in improving the Federal program and realizing the objectives of this Part.

SEC. 104. The Civil Service Commission shall provide for the prompt, fair, and impartial consideration of all complaints of discrimination in Federal employment on the basis of race, creed, color, or national origin. Procedures for the consideration of complaints shall include at least one impartial review within the executive department or agency and shall provide for appeal to the Civil Service Commission.

SEC. 105. The Civil Service Commission shall issue such regulations, orders, and instructions as it deems necessary and appropriate to carry out its responsibilities under this Part, and the head of each executive department and agency shall comply with the regulations, orders, and instructions issued by the Commission under this Part.

PART II—NONDISCRIMINATION IN EMPLOYMENT BY GOVERNMENT CONTRACTORS AND SUBCONTRACTORS

SUBPART A—DUTIES OF THE SECRETARY OF LABOR

SEC. 201. The Secretary of Labor shall be responsible for the administration of Parts II and III of this Order and shall adopt such rules and regulations and issue such orders as he deems necessary and appropriate to achieve the purposes thereof.

SEC. 202. Except in contracts exempted in accordance with Section 204 of this Order, all Government contracting agencies shall include in every Government contract hereafter entered into the following provisions:

"During the performance of this contract, the contractor agrees as follows:

"(1) The contractor will not discriminate against any employee or applicant for employment because of race, creed, color, or national origin. The contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, creed, color, or national origin. Such action shall include, but not be limited to the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the contracting officer setting forth the provisions of this nondiscrimination clause.

"(2) The contractor will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive consideration for employment without regard to race, creed, color, or national origin.

"(3) The contractor will send to each labor union or representative of workers with which he has a collective bargaining agreement or other contract or understanding, a notice, to be provided by the agency contracting officer, advising the labor union or workers' representative of the contractor's commitments under Section 202 of Executive Order No. 11246 of September 24, 1965, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.

"(4) The contractor will comply with all provisions of Executive Order No. 11246 of Sept. 24, 1965, and of the rules, regulations, and relevant orders of the Secretary of Labor.

"(5) The contractor will furnish all information and reports required by Executive Order No. 11246 of September 24, 1965, and by the rules, regulations, and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records, and accounts by the contracting agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations, and orders.

"(6) In the event of the contractor's noncompliance with the nondiscrimination clauses of this contract or with any of such rules, regulations, or orders, this contract may be cancelled, terminated or suspended in whole or in part and the contractor may be declared ineligible for further Government contracts in accordance with procedures authorized in Executive Order No. 11246 of Sept. 24, 1965, and such other sanctions may be imposed and remedies involved as provided in Executive Order No. 11246 of September 24, 1965, or by rule, regulation, or order of the Secretary of Labor, or as otherwise provided by law.

"(7) The contractor will include the provisions of Paragraphs (1) through (7) in every subcontract or purchase order unless exempted by rules, regulations, or orders of the Secretary of Labor issued pursuant to Section 204 of Executive Order No. 11246 of Sept. 24, 1965, so that such provisions will be binding upon each subcontractor or vendor. The contractor will take such action with respect to any subcontract or purchase order as the contracting agency may direct as a means of enforcing such provisions including sanctions for noncompliance: *Provided, however*, That in the event the contractor becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction by the contracting agency, the contractor may request the United States to enter into such litigation to protect the interests of the United States."

SEC. 203. (a) Each contractor having a contract containing the provisions prescribed in Section 202 shall file, and shall cause each of his subcontractors to file, Compliance Reports with the contracting agency or the Secretary of Labor as may be directed. Compliance Reports shall be filed within such times and shall contain such information as to the practices, policies, programs, and employment policies, programs, and employment statistics of the contractor and each subcontractor, and shall be in such form, as the Secretary of Labor may prescribe.

(b) Bidders or prospective contractors or subcontractors may be required to state whether they have participated in any previous contract subject to the provisions of this Order, or any preceding similar Executive order, and in that event to submit, on behalf of themselves and their proposed subcontractors, Compliance Reports prior to or as an initial part of their bid or negotiation of a contract.

(c) Whenever the contractor or subcontractor has a collective bargaining agreement or other contract or understanding with a labor union or an agency referring workers or providing or supervising

apprentices [illegible] Compliance Report shall include such information [illegible] union's or agency's practices and policies affecting [illegible] Secretary of Labor may prescribe: *Provided*, That [illegible] information is within the exclusive possession of a labor union or [illegible] referring workers or providing or supervising [illegible] and such labor union or agency shall refuse to furnish such information to the contractor, the contractor shall so certify to the contracting agency as part of its Compliance Report and shall set forth what efforts he has made to obtain such information.

(d) The contracting agency or the Secretary of Labor may direct that any bidder or prospective contractor or subcontractor shall submit, as part of his Compliance Report, a statement in writing, signed by an authorized officer or agent on behalf of any labor union or any agency referring workers or providing or supervising apprenticeship or other training, with which the bidder or prospective contractor deals, with supporting information, to the effect that the signer's practices and policies do not discriminate on the grounds of race, color, creed, or national origin, and that the signer either will affirmatively cooperate in the implementation of the policy and provisions of this Order or that it consents and agrees that recruitment, employment, and the terms and conditions of employment under the proposed contract shall be in accordance with the purposes and provisions of the Order. In the event that the union, or the agency shall refuse to execute such a statement, the Compliance Report shall so certify and set forth what efforts have been made to secure such a statement and such additional factual material as the contracting agency or the Secretary of Labor may require.

SEC. 204. The Secretary of Labor may, when he deems that special circumstances in the national interest so require, exempt a contracting agency from the requirement of including any or all of the provisions of Section 202 of this Order in any specific contract, subcontract, or purchase order. The Secretary of Labor may, by rule or regulation, also exempt certain classes of contracts, subcontracts, or purchase orders (1) whenever work is to be or has been performed outside the United States and no recruitment of workers within the limits of the United States is involved; (2) for standard commercial supplies or raw materials; (3) involving less than specified amounts of money or specified numbers of workers; or (4) to the extent that they involve subcontracts below a specified tier. The Secretary of Labor may also provide, by rule, regulation, or order, for the exemption of facilities of a contractor which are in all respects separate and distinct from activities of the contractor related to the performance of the contract: *Provided*, That such an exemption will not interfere with or impede the effectuation of the purposes of this Order: *And provided further*, That in the absence of such an exemption all facilities shall be covered by the provisions of this Order.

SUMMARY OF POWERS AND DUTIES OF THE SECRETARY OF LABOR AND THE CONTRACTING AGENCIES

SEC. 205. Each contracting agency shall be primarily responsible for obtaining compliance with the rules, regulations, and orders of the Secretary of Labor with respect to contracts entered into by such agency or its contractors. All contracting agencies shall comply with the rules of the Secretary of Labor in discharging their primary responsibility for securing compliance with the provisions of contracts and otherwise with the terms of this Order and of the rules, regulations, and orders of the Secretary of Labor issued pursuant to this Order. They are directed to cooperate with the Secretary of Labor and to furnish the Secretary of Labor such information and assistance as he may require in the performance of his functions under this Order. They are further directed to appoint or designate, from among the agency's personnel, compliance officers. It shall be the duty of such officers to seek compliance with the objectives of this Order by conference, conciliation, mediation, or persuasion.

SEC. 206. (a) The Secretary of Labor may investigate the employment practices of any Government contractor or subcontractor,

or initiate such investigation by the appropriate contracting agency, to determine whether or not the contractual provisions specified in Section 202 of this Order have been violated. Such investigation shall be conducted in accordance with the procedures established by the Secretary of Labor and the investigating agency shall report to the Secretary of Labor any action taken or recommended.

(b) The Secretary of Labor may receive and investigate or cause to be investigated complaints by employees or prospective employees of a Government contractor or subcontractor which allege discrimination contrary to the contractual provisions specified in Section 202 of this Order. If this investigation is conducted for the Secretary of Labor by a contracting agency, that agency shall report to the Secretary what action has been taken or is recommended with regard to such complaints.

SEC. 207. The Secretary of Labor shall use his best efforts, directly and through contracting agencies, other interested Federal, State, and local agencies, contractors, and all other available instrumentalities to cause any labor union engaged in work under Government contracts or any agency referring workers or providing or supervising apprenticeship or training for or in the course of such work to cooperate in the implementation of the purposes of this Order. The Secretary of Labor shall, in appropriate cases, notify the Equal Employment Opportunity Commission, the Department of Justice, or other appropriate Federal agencies whenever it has reason to believe that the practices of any such labor organization or agency violate Title VI or Title VII of the Civil Rights Act of 1964 or other provision of Federal law.

SEC. 208. (a) The Secretary of Labor, or any agency, officer, or employee in the executive branch of the Government designated by rule, regulation, or order of the Secretary, may hold such hearings, public or private, as the Secretary may deem advisable for compliance, enforcement, or educational purposes.

(b) The Secretary of Labor may hold, or cause to be held, hearings in accordance with Subsection (a) of this Section prior to imposing, ordering, or recommending the imposition of penalties and sanctions under this Order. No order for debarment of any contractor from further Government contracts under Section 209(a)(6) shall be made without affording the contractor an opportunity for a hearing.

SUBPART D—SANCTIONS AND PENALTIES

SEC. 209. (a) In accordance with such rules, regulations, or orders as the Secretary of Labor may issue or adopt, the Secretary or the appropriate contracting agency may:

(1) Publish, or cause to be published, the names of contractors or unions which it has concluded have complied or have failed to comply with the provisions of this Order or of the rules, regulations, and orders of the Secretary of Labor.

(2) Recommend to the Department of Justice that, in cases in which there is substantial or material violation or the threat of substantial or material violation of the contractual provisions set forth in Section 202 of this Order, appropriate proceedings be brought to enforce those provisions, including the enjoining, within the limitations of applicable law, of organizations, individuals, or groups who prevent directly or indirectly, or seek to prevent directly or indirectly, compliance with the provisions of this Order.

(3) Recommend to the Equal Employment Opportunity Commission or the Department of Justice that appropriate proceedings be instituted under Title VII of the Civil Rights Act of 1964.

(4) Recommend to the Department of Justice that criminal proceedings be brought for the furnishing of false information to any contracting agency or to the Secretary of Labor as the case may be.

(5) Cancel, terminate, suspend, or cause to be cancelled, terminated, or suspended, any contract, or any portion or portions thereof, for failure of the contractor or subcontractor to comply with the non-

discrimination provisions of the contract. Contracts may be cancelled, terminated, or suspended absolutely or continuance of contracts may be conditioned upon a program for future compliance approved by the contracting agency.

(6) Provide that any contracting agency shall refrain from entering into further contracts, or extensions or other modifications of existing contracts, with any noncomplying contractor, until such contractor has satisfied the Secretary of Labor that such contractor has established and will carry out personnel and employment policies in compliance with the provisions of this Order.

(b) Under rules and regulations prescribed by the Secretary of Labor, each contracting agency shall make reasonable efforts within a reasonable time limitation to secure compliance with the contract provisions of this Order by methods of conference, conciliation, mediation, and persuasion before proceedings shall be instituted under Subsection (a)(2) of this Section, or before a contract shall be cancelled or terminated in whole or in part under Subsection (a)(5) of this Section for failure of a contractor or subcontractor to comply with the contract provisions of this Order.

SEC. 210. Any contracting agency taking any action authorized by this Subpart, whether on its own motion, or as directed by the Secretary of Labor, or under the rules and regulations of the Secretary, shall promptly notify the Secretary of such action. Whenever the Secretary of Labor makes a determination under this Section, he shall promptly notify the appropriate contracting agency of the action recommended. The agency shall take such action and shall report the results thereof to the Secretary of Labor within such time as the Secretary shall specify.

SEC. 211. If the Secretary shall so direct, contracting agencies shall not enter into contracts with any bidder or prospective contractor unless the bidder or prospective contractor has satisfactorily complied with the provisions of this Order or submits a program for compliance acceptable to the Secretary of Labor or, if the Secretary so authorizes, to the contracting agency.

SEC. 212. Whenever a contracting agency cancels or terminates a contract, or whenever a contractor has been debarred from further Government contracts, under Section 209(a)(6) because of noncompliance with the contract provisions with regard to nondiscrimination, the Secretary of Labor, or the contracting agency involved, shall promptly notify the Comptroller General of the United States. Any such debarment may be rescinded by the Secretary of Labor or by the contracting agency which imposed the sanction.

SUBPART E—CERTIFICATES OF MERIT

SEC. 213. The Secretary of Labor may provide for issuance of a United States Government Certificate of Merit to employers or labor unions, or other agencies which are or may hereafter be engaged in work under Government contracts, if the Secretary is satisfied that the personnel and employment practices of the employer, or that the personnel, training, apprenticeship, membership, grievance and representation, upgrading, and other practices and policies of the labor union or other agency conform to the purposes and provisions of this Order.

SEC. 214. Any Certificate of Merit may at any time be suspended or revoked by the Secretary of Labor if the holder thereof, in the judgment of the Secretary, has failed to comply with the provisions of this Order.

SEC. 215. The Secretary of Labor may provide for the exemption of any employer, labor union, or other agency from any reporting requirements imposed under or pursuant to this Order if such employer, labor union, or other agency has been awarded a Certificate of Merit which has not been suspended or revoked.

PART III — NONDISCRIMINATION PROVISIONS IN FEDERALLY ASSISTED CONSTRUCTION CONTRACTS

SEC. 301. Each executive department and agency which administers a program involving Federal financial assistance shall require as a condition for the approval of any grant, contract, loan, insurance, or guarantee thereunder, which may involve a construction contract, that the applicant for Federal assistance undertake and agree to incorporate, or cause to be incorporated, into all construction contracts paid for in whole or in part with funds obtained from the Federal Government or borrowed on the credit of the Federal Government pursuant to such grant, contract, loan, insurance, or guarantee, or undertaken pursuant to any Federal program involving such grant, contract, loan, insurance, or guarantee, the provisions prescribed for Government contracts by Section 203 of this Order or such modification thereof, preserving in substance the contractor's obligations thereunder, as may be approved by the Secretary of Labor, together with such additional provisions as the Secretary deems appropriate to establish and protect the interest of the United States in the enforcement of those obligations. Each such applicant shall also undertake and agree (1) to assist and cooperate actively with the administering department or agency and the Secretary of Labor in obtaining the compliance of contractors and subcontractors with those contract provisions and with the rules, regulations, and relevant orders of the Secretary, (2) to obtain and to furnish to the administering department or agency and to the Secretary of Labor such information as they may require for the supervision of such compliance, (3) to carry out sanctions and penalties for violation of such obligations imposed upon contractors and subcontractors by the Secretary of Labor or the administering department or agency pursuant to Part II, Subpart D, of this Order, and (4) to refrain from entering into any contract subject to this Order, or extension or other modification of such a contract with a contractor debarred from Government contracts under Part II, Subpart D, of this Order.

SEC. 302. (a) "Construction contract" as used in this Order means any contract for the construction, rehabilitation, alteration, conversion, extension, or repair of buildings, highways, or other improvements to real property.

(b) The provisions of Part II of this Order shall apply to such construction contracts, and for purposes of such application the administering department or agency shall be considered the contracting agency referred to therein.

(c) The term "applicant" as used in this Order means an applicant for Federal assistance or, as determined by agency regulation, other program participant, with respect to whom an application for any grant, contract, loan, insurance, or guarantee is not finally acted upon prior to the effective date of this Part, and it includes such an applicant after he becomes a recipient of such Federal assistance.

SEC. 303. (a) Each administering department and agency shall be responsible for obtaining the compliance of such applicants with their undertakings under this Order. Each administering department and agency is directed to cooperate with the Secretary of Labor, and to furnish the Secretary such information and assistance as he may require in the performance of his functions under this Order.

(b) In the event an applicant fails and refuses to comply with his undertakings, the administering department or agency may take any or all of the following actions: (1) cancel, terminate, or suspend in whole or in part the agreement, contract, or other arrangement with such applicant with respect to which the failure and refusal occurred; (2) refrain from extending any further assistance to the applicant under the program with respect to which the failure or refusal occurred until satisfactory assurance of future compliance has been received from such applicant; and (3) refer the case to the Department of Justice for appropriate legal proceedings.

(c) Any action with respect to an applicant pursuant to Subsection (b) shall be taken in conformity with Section 602 of the Civil Rights Act of 1964 (and the regulations of the administering department or agency issued thereunder), to the extent applicable. In no case shall action be taken with respect to an applicant pursuant to Clause (1) or (2) of Subsection (b) without notice and opportunity for hearing before the administering department or agency.

SEC. 304. Any executive department or agency which imposes by rule, regulation, or order requirements of nondiscrimination in employment, other than requirements imposed pursuant to this Order, may delegate to the Secretary of Labor by agreement such responsibilities with respect to compliance standards, reports, and procedures as would tend to bring the administration of such requirements into conformity with the administration of requirements imposed under this Order: *Provided*, That actions to effect compliance by recipients of Federal financial assistance with requirements imposed pursuant to Title VI of the Civil Rights Act of 1964 shall be taken in conformity with the procedures and limitations prescribed in Section 602 thereof and the regulations of the administering department or agency issued thereunder.

PART IV—MISCELLANEOUS

SEC. 401. The Secretary of Labor may delegate to any officer, agency, or employee in the Executive branch of the Government, any function or duty of the Secretary under Parts II and III of this Order, except authority to promulgate rules and regulations of a general nature.

SEC. 402. The Secretary of Labor shall provide administrative support for the execution of the program known as the "Plans for Progress."

SEC. 403. (a) Executive Orders Nos. 10590 (January 19, 1955), 10722 (August 5, 1957), 10925 (March 6, 1961), 11114 (June 22, 1963), and 11162 (July 28, 1964), are hereby superseded and the President's Committee on Equal Employment Opportunity established by Executive Order No. 10925 is hereby abolished. All records and property in the custody of the Committee shall be transferred to the Civil Service Commission and the Secretary of Labor, as appropriate.

(b) Nothing in this Order shall be deemed to relieve any person of any obligation assumed or imposed under or pursuant to any Executive Order superseded by this Order. All rules, regulations, orders, instructions, designations, and other directives issued by the President's Committee on Equal Employment Opportunity and those issued by the heads of various departments or agencies under or pursuant to any of the Executive orders superseded by this Order, shall, to the extent that they are not inconsistent with this Order, remain in full force and effect unless and until revoked or superseded by appropriate authority. References in such directives to provisions of the superseded orders shall be deemed to be references to the comparable provisions of this Order.

SEC. 404. The General Services Administration shall take appropriate action to revise the standard Government contract forms to accord with the provisions of this Order and of the rules and regulations of the Secretary of Labor.

SEC. 405. This Order shall become effective thirty days after the date of this Order.

LYNDON B. JOHNSON

THE WHITE HOUSE,
September 24, 1965.

[F.R. Doc. 65-10340; Filed, Sept. 24, 1965, 4:18 p.m.]

APPENDIX B

RECOMMENDATIONS

This appendix lists the task force's recommendations. Programs or organizational units affected by each recommendation are also listed.

Making the Legal Requirements Known

1. We recommend that OE and NIE fully inform potential and actual recipients of Federal education aid of their obligations to eliminate sex discrimination under Title IX and Executive Order 11246. Specifically, we recommend that:

   a. All OE and NIE guidelines, regulations and other appropriate documents be amended to include a statement on Title IX, P.L. 92-318, and require applicants to submit an assurance of compliance. OE and NIE should attach an addendum to this effect to all FY 1973 program documents already printed without this statement.

ESEA I, III, V, VII	Dropout Prevention
Follow Through	Technology Demonstrations
Impact Aid	Drug Education
EHA	Environmental Education
ESA	Health and Nutrition
VEA; AEA; MDTA	OE-Contracts & Grants Division
Career Education Model Installation	Teacher Corps
Occupational Education	Right to Read
HEA I, III, IV, VII, IX	Fund for the Improvement of Postsecondary Education (FUND)
EPDA, Part E	Community Colleges
LSCA; NDEA III	Indian Education
ESEA II; HEA II	Consumer Education
NDEA VI	Ethnic Heritage
Fulbright-Hays	NIE, all programs
EPDA, Sec. 504, Parts B-2, C, D, F	

   b. All OE and NIE contracts and grants officers provide all applicants with detailed instructions on their obligations under Title IX and Executive Order 11246 before they sign assurances of compliance. Contractors should receive a copy of Revised Order No. 4, Department of Labor guidelines and HEW guidelines. All potential aid recipients should receive Title IX regulations and guidelines when published.

OE-Contracts & Grants Division
NIE-Contracts & Grants Officers

2. We recommend that OE and NIE provide information and technical assistance concerning Title IX and its implications directly to State education personnel, school administrators and education personnel throughout the country. Specifically, we recommend that:

   a. Each Deputy Commissioner in OE and equivalent within NIE be responsible for conducting extensive workshops and

conferences on Title IX for key State and local personnel in their respective areas of concern. All regular program workshops and conferences sponsored by the two agencies should include briefings on Title IX. These should be conducted on a continuing basis as long as sex discrimination remains a major problem in education. A specific person in NIE and OE should be designated to coordinate each agency's plans for these activities.

OE Deputies
OPBE
OPA
ESEA I, III, V, VII
Follow Through
Impact Aid
EHA
ESA
VEA; AEA; MDTA
Career Education Model Installation
Occupational Education
HEA I, III, IV, VII, IX
EPDA, Part E
LSCA; NDEA III
ESEA II, HEA II
NDEA VI; Fulbright-Hays
EPDA Sec. 504, Parts B-2; C, D, F
Dropout Prevention
Technology Demonstrations
NCES
Drug Education
Environmental Education
Health & Nutrition
Teacher Corps
Right to Read
Community Colleges
Indian Education
Consumer Education
Ethnic Heritage
NIE Deputies
NIE Planning & Evaluation Staff
NIE, all programs
FUND

b. The Commissioner of Education make Title IX a major topic of discussion in his next meeting with the Chief State School Officers. He should emphasize the leadership role the Federal government will expect the State education agencies to play in eliminating sex discrimination at the State and local levels.

Commissioner of Education

Monitoring for Compliance

3. We recommend that OE and NIE monitor their own programs for Title IX compliance. Specifically, we recommend that OE and NIE include compliance status checks on all regular site reviews, including State management reviews conducted under ESEA Title V. OE's Deputy Commissioners and equivalent officials in NIE should work with the Office for Civil Rights to develop

reporting forms and uniform criteria for monitoring compliance status in site reviews.

OE Deputies
ESEA I, III, V, VII
Follow Through
Impact Aid
EHA
ESA
VEA; AEA; MDTA
Career Education Model Installation
Occupational Education
HEA I, III, IV, VII, IX
EPDA, Part E
LSCA; NDEA III
ESEA II, HEA II
NDEA VI; Fulbright-Hays
EPDA Sec. 504, Parts B-2; C, D, F
Dropout Prevention
Technology Demonstrations
Drug Education
Environmental Education
Office for Civil Rights
Health & Nutrition
Teacher Corps
Right to Read
Community Colleges
Indian Education
Consumer Education
Ethnic Heritage
NIE Deputies
FUND

Leverage through Discretionary Authority:
Instructional and Information Materials

4. We recommend that OE and NIE insure that all instructional and public relations materials developed with OE and NIE funds for national distribution be free of sex biases. This would include career and vocational materials used in model and exemplary programs. Specifically, we recommend that:

   a. Guidelines, requests for proposals and other appropriate documents stress as a condition for funding that materials be developed without sex stereotyping.

   b. OE's Office of Public Affairs, in cooperation with OE and NIE program staff, develop a guidebook concerned with avoiding sex biases to assist contractors, grantees and agency staff in developing materials.

   c. OE and NIE designate at least one staff person within each appropriate program and public affairs office to clear new materials before their completion and dissemination. These staff people should be selected after consultation with the women in these offices.

d. OE and NIE review existing projects for sex biases. As part of this effort, NIE support for the "Self Directed Search" guidance system developed at Johns Hopkins should be terminated.

OPA	NIE - Applied Studies
EHA, Part F	- New Initiatives
VEA, Parts C, D, I	- Career Education
Career Education Model Installation	- Dissemination
Occupational Education	- Field Initiated Studies

Leverage through Discretionary Authority: Career Education

5. We recommend that OE and NIE work together to eliminate sex discrimination in career preparation. Specifically, we recommend that:

a. OE and NIE establish the elimination of sex segregation as one of career education's major goals, and emphasize that new goal in materials explaining the career education concept.

Commissioner of Education	EPDA, Part F
Director of NIE	Occupational Education
VEA, Parts A, B, C, D, F, G, H	NIE - Career Education
Career Education Model Installation	

b. Program guidelines and other appropriate documents be amended to emphasize that the elimination of sex segregation is a priority in education and training for careers.

VEA, Parts A, B, C, D, F, G, H	Occupational Education
Career Education Model Installation	Community Colleges
MDTA	NIE - Career Education
EPDA, Part F	

c. Guidelines require all model and exemplary programs in career education and training report their success in including students of both sexes in all education activities.

VEA, Parts C, D	Occupational Education
Career Education Model Installation	NIE - Career Education
MDTA	

Other Areas for Action--Training

6. We recommend that OE and NIE work to equalize the proportion of men and women at all levels and in all areas of education through training programs. Personnel training programs guidelines should be modified to require applicants to include plans for increasing the numbers of male and female participants in fields where either sex is underrepresented as well as report annually on progress towards achieving that goal. Specifically, we recommend that:

   a. Greater numbers of women be trained in areas where they are currently underrepresented, such as educational administration in all fields, trades and industry in vocational education, educational research and development, educational technology, the "hard" sciences and in other appropriate areas.

EHA, Part D
AEA, Teacher Training
EPDA, Part E
HEA IX
HEA II (Librarian Training)
NDEA VI; Fulbright-Hays
EPDA, Parts C, D, F
NIE - Researcher Training

   b. Greater numbers of men be trained for employment in entry level positions in areas where they are currently underrepresented, such as early childhood education, elementary education, special education, home economics, business/office education, the health professions and in other appropriate areas. In addition, greater numbers of men should be trained as paraprofessionals in all fields.

EHA, Part D
AEA, Teacher Training
HEA II (Librarian Training)
EPDA, Sec. 504, Parts C, D, F
Teacher Corps

Other Areas for Action--Project Administration

7. We recommend that OE and NIE promote the involvement of women in top positions in OE and NIE funded projects. Specifically, we recommend that:

   a. OE and NIE amend guidelines for discretionary programs to require that applicants for funds submit data on title, salary and responsibilities of top project staff by sex.

b. OE and NIE review that information for evidence of discrimination and negotiate before funding for the correction of any inequities.

OPBE
OPA
ESEA III, VII
Follow Through
EHA, Parts C, D, E, F, G
ESA
VEA, Parts C, D, I
Career Education Model Installation
AEA - Teacher Training, Special Projects
MDTA
Occupational Education
HEA I, II, IV (Cooperative Education, Students from Disadvantaged Backgrounds)
HEA IX; EPDA, Part E
HEA II
NDEA VI; Fulbright-Hays
EPDA, Sec. 504, Parts C, D, F
Dropout Prevention
Technology Demonstrations
NCES
Drug Education
Environmental Education
Health & Nutrition
Teacher Corps
Right to Read
Community Colleges
Indian Education
Consumer Education
Ethnic Heritage Fund
NIE - all programs
FUND

c. In all program guidelines and other official program documents, OE and NIE emphasize their interest in receiving applications from women and for projects directed by women.

See 1 (a).

d. OE and NIE, working with women's organizations, encourage women to apply for discretionary program funds. Women's organizations should be included on appropriate mailing lists for application notification and guideline distribution.

See 7 (a) & 7 (b)

Other Areas for Action--Research

8. We recommend that OE, NIE and the Assistant Secretary for Planning and Evaluation (ASPE) review for sex biases all research instruments to be used in education studies they fund.

ASPE
OPBE
NCES
NIE - Planning &
Evaluation Staff

NIE - Applied Studies
- New Initiatives
- Field Initiated Studies

9. We recommend that OE, NIE and ASPE insure, before funding education research projects, that projects studying people use samples of both sexes and report results by sex. Exceptions should be made only when the information sought is already available for one sex or when a study is explicitly designed to serve the goal of equality of the sexes and special circumstances require a one-sex study.

   Specifically, we recommend that guidelines, requests for proposals and other appropriate documents state the conditions under which one-sex studies are permissible and request that anyone applying for funds for such a study provide a justification.

See 8

Strengthening Title IX

10. We recommend that the Federal Interagency Committee on Education explore the implications of Title IX for other Federal agencies providing education assistance and encourage those agencies to take the necessary action to enforce Title IX.

ASE (FICE)

11. We recommend that the Assistant Secretary for Education strongly urge the amendment of Title IX to cover admissions in elementary and secondary schools, military academies, single sex public undergraduate colleges and private coeducational undergraduate colleges.

ASE

Title IX Enforcement: Accountability

12. We recommend that HEW's Office for Civil Rights strengthen its procedures for holding contractors accountable for compliance to Executive Order 11246. Specifically, we recommend that HEW guidelines require contractors to submit affirmative action plans for approval whether or not a compliance review has been made; plans should be accepted or rejected within three months after submission.

Office for Civil Rights

Title IX Enforcement: Compliance Standards

13. We recommend that the Office for Civil Rights develop strong uniform procedures for investigating sex discrimination in education. Specifically, we recommend that:

    a. OCR develop a standard procedure for collecting and evaluating information at defined intervals on the compliance status of institutions under Title IX and Executive Order 11246.

    b. Investigations initiated under Executive Order 11246 be carried out in conjunction with investigations initiated under Title IX.

Office for Civil Rights

Title IX Enforcement: State Education Agencies

14. We recommend that the Office for Civil Rights work directly with each State to overcome present inequities experienced by women in State education agencies. Specifically, we recommend that OCR set the investigation of State education agencies as a priority under Title IX enforcement.

Office for Civil Rights

Educating the Public

15. We recommend that the Assistant Secretary for Education, the Commissioner of Education, the Director of NIE and their respective Deputies should arrange to speak before key national education groups on their responsibilities for ending discriminatory practices. For example, we suggest that:

    a. The Assistant Secretary for Education or the Commissioner of Education address a conference of the major book publishing associations on OE's concern with sex stereotyping in educational materials and its effect on the status of women in education.

    b. The Director of NIE's Career Education Task Force and the Deputy Commissioner for Occupational and Adult Education speak before the American Vocational Association and other key vocational groups on the need to encourage young men and women to explore the entire range of vocational opportunities.

    c. The Assistant Secretary for Education or the Commissioner of Education discuss the detrimental effects of inadequate counseling on lowering female career aspirations before the national meetings of secondary school counselors.

ASE	Director of NIE
Commissioner of Education	NIE Deputies
OE Deputies	NIE Career Education Director

16. We recommend that the Office of Public Affairs use the range of media at its disposal to expand public consciousness of the growing struggle among women to secure equal opportunities in education. Specifically, we recommend that:

    a. OPA work with program officials to produce a documentary film for public distribution on ways education can help women to break traditional sex barriers in various occupations at all levels.

b. OPA organize an exhibit on women and sex discrimination in education for use at education conferences and at gatherings of women's rights groups. The exhibit might premiere in the Office of Education's main lobby, and focus particularly on Title IX, sexism in career training, and sex stereotyping in elementary school curricula.

c. In cooperation with the Office for Civil Rights in HEW, OPA develop and disseminate a pamphlet to the general public on laws protecting women's rights to equal opportunities in education.

d. American Education continue to publish articles to be made available in reprint form on the roles and progress of women in education.

OPA

Office for Civil Rights

Exploring New Roles for Women and Men

17. We recommend that OE and NIE foster educational approaches which encourage children of both sexes to explore new roles. Specifically, we recommend that:

a. OE and NIE fund the development of educational and guidance techniques and materials designed to encourage students to explore new roles, particularly in educational areas where sex discrimination is especially strong, as in career education and guidance testing.

FSEA III
EHA, Part E
VEA, Parts C, D, I; MDTA
Career Education Model Installation

Occupational Education
NIE - Applied Studies
- New Initiatives
- Career Education

b. OE support the development and dissemination of teacher training materials on avoiding sex biases. In addition, we recommend that OE and NIE personnel training program guidelines be amended to encourage projects to include training in overcoming sex biases.

EHA, Part D
EPDA, Part E
HEA II

EPDA, Sec. 504, Parts B-2, C, D, F
Teacher Corps
NIE - Researcher Training

c. OE develop and disseminate a bibliography of unsex-biased materials appropriate for school use, especially at the elementary and secondary levels.

OPA

d. OE and NIE insure that all model and exemplary career education projects include instruction that explicitly addresses the problems of sex-stereotyped occupations and dispels myths about women in the work force.

VEA, Parts C, D; MDTA
Career Education Model Installation
Occupational Education

NIE - New Initiatives
- Career Education

Child Care and Serving School-Aged Parents

18. We recommend that OE, NIE encourage educational institutions to provide opportunities for parents raising children to pursue their education. Specifically, we recommend that:

a. Day care be made an allowable cost in all programs (including construction programs) serving people of child-bearing age. OE should recommend new legislation where program guidelines cannot accomplish this.

Office of Legislation
ESEA III
Impact Aid (P.L. 815)
EHA, Parts B, C, D, E
VEA, Parts A, B, D, F, G, H
AEA; MDTA
Career Education Model Installation
Occupational Education

EPDA Sec. 504, Parts B-2, C, D, F
Dropout Prevention
Technology Demonstrations
Drug Education
Environmental Education
Health and Nutrition
Teacher Corps
Right to Read

HEA I, III, IV (Cooperative Education and Students from Disadvantaged Backgrounds)
HEA VII, IX; EPDA, Part E
LSCA I, II; HEA II
NDEA VI; Fulbright-Hays
Community Colleges
Indian Education
Consumer Education
Ethnic Heritage
FUND
NIE - Researcher Training

b. OE set aside at least two million dollars from discretionary monies for projects to support the work of the Interagency Task Force on Comprehensive Programs for School-Aged Parents.

ESEA III
EHA, Part C
HEA, Part C, D
AEA Special Projects; MDTA
HEA I
Dropout Prevention
Nutrition and Health

Part-Time Study

19. We recommend that OE and NIE promote part-time study opportunities for women returning to education. Specifically, we recommend that:

a. OE and NIE insure that part-time students are admitted to projects funded under postsecondary and other programs serving adults. OE should recommend legislation to accomplish this where it cannot be achieved through guideline changes.

Office of Legislation
VEA, Part B; MDTA
AEA Teacher Training
Occupational Education
HEA III, IV (Students from Disadvantaged Backgrounds)
HEA IX; EPDA, Part E
HEA II Librarian Training
NDEA VI, Fulbright-Hays
EPDA, Sec. 504, Parts B-2, C, D, F
Teacher Corps
Community Colleges
FUND

b. Student aid program guidelines urge institutions to make Federal financial aid available to half-time students in proportion to their enrollment in the student body.

HEA IV (Student Aid Programs)

Accommodating Other Programs to the Special Needs of Women

20. We recommend that OE and NIE guidelines for programs aimed at adults state that projects serving women wishing to continue their education be given special consideration. In addition, the Educational Opportunity Centers established under P.L. 92-318 should identify this population as a special target group, and Title I of the Higher Education Act should use its discretionary set-aside to fund model programs serving this group.

EHA, Part D
VEA, Parts B, C, D
Career Education Model Installation
AEA - Teacher Training
Occupational Education
AEA I, IV (Students from Disadvantaged Backgrounds and Educational Opportunity Centers)
EPDA, Sec. 504, Parts C, D, E, F
HEA II Librarian Training
NDEA VI; Fulbright-Hays
Teacher Corps
Community Colleges
FUND
Researcher Training

21. We recommend that the Office of Public Affairs undertake a public service information campaign publicizing new opportunities for women in education through radio and television spots as well as through printed materials. For example, we suggest that:

    a. OE make use of the excellent materials already developed by the Women's Bureau at the Department of Labor to encourage young women to enter male-dominated professions, and cooperate with the Women's Bureau in developing new materials.

    b. OE direct information on student financial aid to women in the home who plan to return to education or employment training after several years' absence.

OPA

22. We recommend that OE, NIE and The Fund for the Improvement of Postsecondary Education experiment with new educational approaches with a potential for expanding educational opportunities for women in both academic and vocational education.

VEA, Part C
NIE - New Initiatives
NIE - Career Education
- Experimental Schools
FUND

National Statistics

23. We recommend that NCES amend its present surveys to collect the following data by sex:

    a. A breakdown by sex for elementary school pupils in each grade, to be added to the ELSEGIS State Fall Report on Staff and Pupils.

    b. Secondary school subject area enrollments by sex, to be added to the ELSEGIS Survey of Secondary School Offerings, Enrollments and Curriculum Practices 1972-73.

    c. All data on elementary school principals and on the number of specialists by sex, to be collected in the Belmont Elementary School Survey. This survey's questionnaire on teacher characteristics is thorough and should be used as a model for collecting information isolating sex as a variable.

        NOTE: Data by sex in characteristics of all school staff are needed to determine whether women remain at lower positions with lower pay despite equivalent or better qualifications than the male staff.

    d. Secondary school staff and principal data by sex, to be collected in the Belmont Secondary School Survey. We urge that the staff and school questionnaires be expanded to collect by sex the same information as the Elementary School Survey collects on elementary school staff (e.g., salary, years of teaching experience, degrees earned, etc.).

        NOTE: No data on characteristics of teaching or administrative staff in secondary schools are currently collected at all, no less by sex, so that OE has no information on the status of women in secondary schools.

    e. The number and salary distribution by sex of tenured higher education faculty, to be added to the HEGIS Employees in Higher Education survey. In addition, NCES should make an effort to provide HEGIS salary data to OCR in a timely fashion for use in enforcing Title IX and Executive Order 11246.

f. The age distribution for men and women by field and degree conferred, to be added to the HEGIS Earned Degrees and Other Formal Awards Conferred survey.

NOTE: Such data would indicate the extent to which men and women interrupt their education and at what age, and will provide an estimate of the length of interruption by level and academic field.

g. Enrollment data for adult and continuing education by sex to be collected in the Adult and Continuing Education in Institutions of Higher Education survey.

h. All data on adult basic education staff and participants by sex to be collected in the Adult Basic Education survey (based on the annual reports submitted by States).

i. Vocational education enrollment data by sex for each institution to be collected in the Vocational Education Directories.

NOTE: These data would indicate what types of vocational schools (including area vocational schools) operate as single sex institutions.

j. Data by sex on library staff by level to be collected in the library and museum surveys (Public Library Survey, Federal Library Survey, Museum Survey and School Library Survey).

NCES

Program Data

24. We recommend that OE and NIE collect and report to the public basic data on all programs by sex. Specifically, we recommend that:

a. Programs serving a student clientele collect program participant data by sex.

ESEA I, III, VII
Follow Through
EHA, Parts B, C, D, G
VEA, Except Part I
Career Education Model Installation
AEA; MDTA
Occupational Education
HEA I, IV, IX
EPDA, Part E
HEA II Librarian Training
NDEA VII; Fulbright-Hays
EPDA, Sec. 504, Parts B-2, C, D, F
Dropout Prevention
Drug Education
Environmental Education
Health and Nutrition
Teacher Corps
Right to Read
Community Colleges
Indian Education
Consumer Education
Ethnic Heritage
NIE - Researcher Training
- Career Education
- Experimental Schools

b. Discretionary programs collect and update information on sex and salary of top project staff quarterly.

NOTE: All staff information could be collected by the PGIS system, on the procurement cover sheet (PCS). No commitment action should be made until all information is entered.

See 7 (a).

c. All programs prepare descriptive summaries of projects designed to improve educational opportunities for women.

See 1 (a).

d. Fellowship and training programs collect data on the number of applicants by sex.

EHA, Part D
AEA, Teacher Training
HEA IV (student aid programs)
EPDA, Part E; HEA IX
HEA II Librarian Training
NDEA VI
Fulbright-Hays
EPDA, Sec. 504, Parts B-2, C, D, F
Teacher Corps
NIE-Researcher Training

e. The student financial aid programs should collect data on the amount of aid and number of grants by sex. In addition, data by sex on the guaranteed loan program should include the number and amount of loans recommended by student financial aid officers.

NOTE: Under P.L. 92-318, student financial aid officers for the first time must certify the amount of a student's financial need before a bank can make a guaranteed loan.

VEA, Part H

HEA IV (student aid programs)

Evaluation

25. We recommend that all OE and NIE sponsored evaluations include analyses of the presence, causes and impact of sex discrimination in each of the program of educational areas being studied. For many program areas, particularly fellowship and training programs, expanded follow-up studies of participants by sex will be required.

OPBE

NIE - Planning and Evaluation Staff

Research Studies

26. We recommend that OE and NIE support a series of studies on sex role development and sex discrimination in education. Specifically, we recommend that:

a. NIE review existing research on the development of sex roles and self image and support a series of research and development efforts designed to fill the gaps in current knowledge of this topic.

NIE - Applied Studies
- New Initiatives

NIE - Career Education
- Field Initiated Studies

b. OE or NIE support a study on how the attitudes of counselors, teachers, administrators, parents and peers affect career plans and expectations of women and men, with a separate analysis of sexism in guidance tests.

OPBE

NIE - Planning & Evaluation Staff

c. The full-scale study resulting from the pilot study, Barriers to Women's Participation in Postsecondary Education, be broadened to include a representative sample of males as a comparison group.

NCES

d. OE support a study of the barriers female and male nonhigh school graduates face in acquiring additional education and training.

OPBE

Reporting and Disseminating Information

27. We recommend that OE and NIE expand efforts to report and disseminate information on women in education. Specifically, we recommend that:

a. NCES publish, at least annually, special mini-reports and projections on the relative status of women and men in education, both as students and employees. In addition, NCES' regular reports should include separate chapters comparing data on men and women.

NCES

b. Program data appearing in annual reports include participant data by sex.

See 24 (a).

c. OPBE and its equivalent in NIE include in their evaluation and planning studies special sections on the impact of programs on the sexes.

OPBE

NIE - Planning and Evaluation Staff

Equality for Women as a Priority

28. We recommend that equality for the sexes in education be declared an official priority of both OE and NIE. In line with that priority, we recommend that:

a. Implementation of recommendations be tracked through the Operational Planning System at the Assistant Secretary or Commissioner/Director level.

ASE
Commissioner of Education

Director of NIE

b. At least 10 percent of the appropriations for the following programs be spent on projects which make a special contribution to equal educational opportunity for women:

Education Professions Development Act, Parts D, E and F
Education for the Handicapped Act, Part D

Funds could be used in projects which advance women in school administration, train teachers to avoid sex bias, train administrators on implementing Title IX and train teacher trainers to sensitize teachers to sex bias.

Higher Education Act, Title II

Funds could be used in projects which advance women in library administration, support workshops on unsexbiased materials and assist librarians in building collections relating to women's rights and women's issues.

Vocational Education Act, Parts C, D and I

Funds could be used in projects which study the obstacles to women's full participation in all areas of vocational education, demonstrate approaches to breaking down sex stereotypes in vocational education and develop curriculum materials which counteract career sex stereotypes.

Fund for the Improvement of Postsecondary Education

Funds could be used for experiments in academic and vocational education with a potential for expanding educational opportunities for women returning to school or work after several years' absence.

Civil Rights Act of 1964, Title IV

Funds would be used to assist sex segregated schools in desegregation.

Staff Education

29. We recommend that OE and NIE undertake to educate their own staffs to avoid sex bias in agency operation and program management. Specifically, we recommend that:

    a. Briefings for all supervisory staff be conducted on the implications of Title IX and other sex discrimination legislation for OE's and NIE's program operations.

    b. OE and NIE arrange for training programs to create employee awareness of sex biases and their influences on the actions of employees.

Commissioner of Education Director of NIE

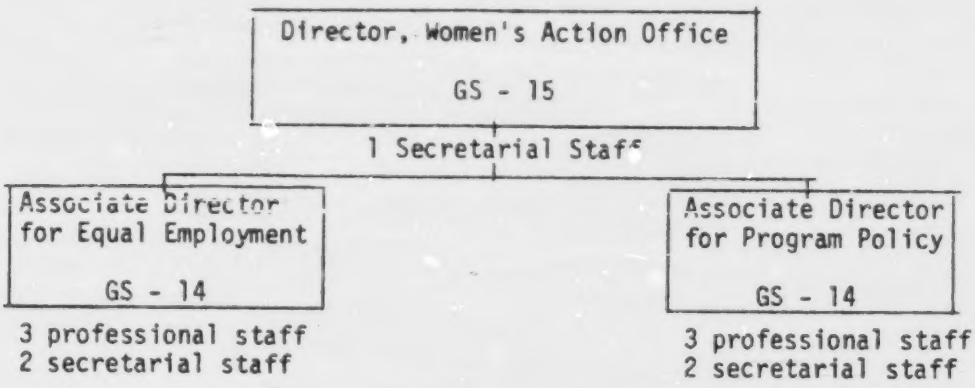
Women's Action Office and Advisors

30. We recommend that both OE and NIE establish a Women's Action Office to see that steps to improve the status of women both inside and outside the agency are carried out smoothly and expeditiously. Specifically, we recommend that:

    a. These offices serve as a continuing source of advice to the Commissioner and the Director on progress towards that goal and on new steps needed to help women secure equality in education and in the Federal education agencies.

    b. These offices report directly to the Assistant Commissioner for Special Concerns and an official of equivalent stature in NIE and absorb the functions of the Federal Women's Program Coordinator.

c. The following organization for the Women's Action Office be developed:



NIE would have a smaller staff consonant with the agency's present size.

Commissioner of Education Director of NIE

31. We recommend that both OE and NIE convene an ad hoc committee by advertising for people interested in helping in the selection of the Director and Associate Directors of the Women's Action Offices. These ad hoc committees would be no more than 15 members, elected from among the original volunteers. These committees would draw up criteria for the selection of the Director and the Associate Directors and identify and recommend candidates to fill those positions. Upon final selection of candidates by the OE Commissioner and NIE Director, the responsibilities of the ad hoc committees would terminate.

Commissioner of Education Director of NIE

32. We recommend that Women's Action Advisors be designated throughout the agencies to link program policies and employees with the work of the Women's Action Office. Specifically, we recommend that:

a. On a continuing basis, Advisors work with the Women's Action Office in carrying out their mission throughout the agencies by recommending priorities for action, reviewing program and employment activities affecting women and keeping communication channels open between program officials and the Women's Action Office.

b. Advisors be designated by the Directors of the respective Women's Action Offices.

c. Advisors be regular employees, released part-time from their regular duties.

d. Each OE Deputyship and equivalent in NIE have at least two Advisors, one for internal employment and one for programs. OE should have one Advisor concerned with employment for every 200 people in a deputyship, with the Office of the Commissioner combined with the Deputyship for Development. OE should have one Advisor concerned with program policy for every 200 people in the three program Deputyships. According to OE's current staffing, that would make a total of 24; NIE Advisors would be chosen in a comparable manner.

Commissioner of Education
OE Deputies

Director of NIE
NIE Deputies

Special Policy Positions

33. We recommend that OE and NIE substantially increase the proportion of women advising on the operation of OE programs. Specifically, we recommend that:

a. All NIE and OE recommendations for advisory councils and special commissions aim to bring the proportion of women on each to 50 percent.

ASE
Commissioner of Education

Director of NIE

b. The same goal be set for the appointment of women to program review panels, outside evaluation teams, technical assistance personnel and consultants. Bureau chiefs should be responsible for approving these appointments to see that goals are being met. In addition, OE and NIE should adopt a standard fee for compensating consultants, regardless of salary, experience or other considerations.

c. Task forces be approximately 50 percent female. OE and NIE staff should avoid defining criteria for task force

membership so that a predominance of men must be chosen. Bureau chiefs and Deputies should review and approve task force membership to see that goals are being met.

OE Deputies
OE Bureau Chiefs

NIE Deputies

d. Bureau chiefs and Deputies report quarterly to the Commissioner of Education and to the Director of NIE on the male/female makeup of all review panels, outside evaluation teams, technical assistants, consultants and task forces.

Commissioner of Education
OE Deputies
OE Bureau Chiefs

Director of NIE
NIE Deputies

APPENDIX C

UNITS AFFECTED BY TASK FORCE RECOMMENDATIONS

Units Affected by Task Force Recommendations

NEW UNITS

Unit Affected	Recommendations
ASSISTANT SECRETARY FOR EDUCATION.	5(a), 10, 11, 15, 28(a), 33 (a)
COMMISSIONER OF EDUCATION.	2(b), 5(a), 15, 28(a), 29, 30, 31, 32, 33(a, d)
DIRECTOR OF NIE.	5(a), 15, 28(a), 29, 30, 31, 32, 33(a, d)
OFFICE FOR CIVIL RIGHTS.	3, 12, 13, 14, 16(c)
ASSISTANT SECRETARY FOR PLANNING AND EVALUATION.	8

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR SCHOOL SYSTEMS.	2(a), 3, 15, 32, 33(b, c, d)
Bureau of Elementary and Secondary Education	33(b, c, d)
Elementary and Secondary Education Act	
- Title I (Educationally Deprived Children).	1(a), 2(a), 3, 24(a), 27(b)
- Title III (Supplementary Centers).	1(a), 2(a), 3, 7, 17(a), 18, 24(a, b, c), 27(b)
- Title V (Strengthening State Departments of Education) . .	1(a), 2(a), 3
- Title VII (Bilingual Education).	1(a), 2(a), 3, 7, 24(a, b, c), 27(b)
- Follow Through	1(a), 2(a), 3, 7, 24(a, b, c), 27(b)
Impact Aid	
- P.L. 874 (Maintenance/Operations).	1(a), 2(a), 3, 24(c)
- P.L. 815 (Construction).	1(a), 2(a), 3, 18(a), 24(c)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR SCHOOL SYSTEMS (continued)	
Bureau of Education for the Handicapped	33(b, c, d)
Education for the Handicapped Act	
- Part B (State Grants).	1(a), 2(a), 3, 18(a), 24(a, c), 27(b)
- Part C (Special Target Program).	1(a), 2(a), 3, 7, 18, 24(a, b, c), 27(b)
- Part D (Training).	1(a), 2(a), 3, 6(a, b), 7, 17(b), 18(a 19(a), 20, 24(a, b, c, d), 27(b), 28(
- Part E (Research/Demonstration).	1(a), 2(a), 3, 7, 17(a), 18(a), 24(b, c)
- Part F (Media Services/Captioned Films).	1(a), 2(a), 3, 4(a, c, d), 7, 24(b, c)
- Part G (Special Learning Disabilities)	1(a), 2(a), 3, 7, 24(a, b, c), 27(b)
Bureau of Equal Educational Opportunity	33(b, c, d)
Emergency School Aid	1(a), 2(a), 3, 7, 24(b, c)
Civil Rights Act	
- Title IV (Desegregation of Public Education)	28(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR OCCUPATIONAL AND ADULT EDUCATION	2(a), 3, 15, 32, 33(b, c, d)
Vocational Education Act	
- Part A (Special Needs).	1(a), 2(a), 3, 5(a, b), 18(a), 24(a, c), 27(b)
- Part B (State Grant).	1(a), 2(a), 3, 5(a, b), 18(a), 19(a), 20, 24(a, c), 27(b)
- Part C (Research)	1(a), 2(a), 3, 4(a, c, d), 5, 7, 17(a, 18(b), 20, 22, 24(a, b, c), 27(b), 28(b
- Part D (Exemplary Programs)	1(a), 2(a), 3, 4(a, c, d), 5, 7, 17(a, 18, 20, 24(a, b, c), 27(b), 28(b)
- Part F (Consumer/Homemaking).	1(a), 2(a), 3, 5(a, b), 18(a), 24(a, c), 27(b)
- Part G (Cooperative Education).	1(a), 2(a), 3, 5(a, b), 18(a), 24(a, c, e), 27(b)
- Part H (Work Study)	1(a), 2(a), 3, 5(a, b), 18(a), 24(a, c), 27(b)
- Part I (Curriculum Development)	1(a), 2(a), 3, 4(a, c, d), 7, 17(a), 24(b, c), 28(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR OCCUPATIONAL AND ADULT EDUCATION (cont'd)	
Career Education Model Installation.	1(a), 2(a), 3, 4(a, c, d), 5, 7, 17(a, d), 18(a), 20, 24(a, b, c) 27(b)
Adult Education Act	
- Grants to States	1(a), 2(a), 3, 18(a), 24(a, c), 27(b)
- Teacher Training	1(a), 2(a), 3, 6(a, b), 7, 18(a), 19(a), 20, 24(a, b, c, d), 27(b)
- Special Projects	1(a), 2(a), 3, 7, 18, 24(a, b, c), 27(b)
Manpower Development and Training Act.	1(a), 2(a), 3, 5, 7, 17(a, d), 18, 19(a), 24(a, b, c), 27(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR HIGHER EDUCATION.	2(a), 3, 15, 32, 33(b, c, d)
Bureau of Higher Education.	33(b, c, d)
Higher Education Act	
- Title I (Community Service and Continuing Education) . . .	1(a), 2(a), 3, 7, 18, 20, 24(a, b, c), 27(b)
- Title III (Strengthening Developing Institutions).	1(a), 2(a), 3, 7, 18(a), 19(a), 24(b, c)
- Title IV (Educational Opportunity Grants).	1(a), 2(a), 3, 19(b), 24, 27(b)
(College Work Study).	1(a), 2(a), 3, 19(b), 24, 27(b)
(Insured Student Loans)	1(a), 2(a), 3, 19(b), 24(a, c, d, e), 27(b)
(Direct Loans).	1(a), 2(a), 3, 19(b), 24(a, c, d, e), 27(b)
(Cooperative Education)	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)
(Students from Disadvantaged Backgrounds)	1(a), 2(a), 3, 7, 18(a), 19(a), 20, 24(a, c, d), 27(b)
- Title VII (Construction of Academic Facilities).	1(a), 2(a), 3, 18(a), 24(c)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR HIGHER EDUCATION (continued)	
Education Professions Development Act	
- Part E (College Personnel Training Program)	1(a), 2(a), 3, 6(a), 7, 17(b), 18(a) 19(a), 20, 24(a, b, c, d), 27(b), 28(b)
Bureau of Libraries and Learning Resources	33(b, c, d)
Library Services and Construction Act	
- Title I (Grants for Public Libraries)	1(a), 2(a), 3, 18(a), 24(c)
- Title II (Construction)	1(a), 2(a), 3, 18(a), 24(c)
- Title III (Interlibrary Cooperation).	1(a), 2(a), 3, 24(c)
Elementary and Secondary Education Act	
- Title II (School Library Resources)	1(a), 2(a), 3, 24(c)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR HIGHER EDUCATION (continued)	
Higher Education Act	
- Title II (College Library Resources)	1(a), 2(a), 3, 24(c), 28(b)
(Librarian Training)	1(a), 2(a), 3, 6(a, b), 7, 17(b), 18(a 19(a), 20, 24(a, b, c, d), 27(b), 28(b
(Library Demonstration)	1(a), 2(a), 3, 7, 24(b, c), 28(b)
National Defense Education Act	
- Title III (Equipment and Minor Remodeling)	1(a), 2(a), 3, 24(c)
Institute for International Studies	33(b, c, d)
National Defense Education Act	
- Title VI (Language Training and Area Studies)	1(a), 2(a), 3, 6(a), 7, 18(a), 19(a), 20, 24, 27(b)
Fulbright-Hays Act	1(a), 2(a), 3, 6(a), 7, 18(a), 19(a), 20, 24, 27(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR DEVELOPMENT.	2(a), 3, 15, 32, 33(b, c, d)
National Center for the Improvement of Educational Systems	33(b, c, d)
Education Professions Development Act	
- Part A, Section 504 (Attracting Persons into the Field of Education)	1(a), 2(a), 3, 6(b), 7, 17(b), 18(a) 19(a), 20, 24(a, b, c, d), 27(b)
- Part B-2 (State Grants)	1(a), 2(a), 3, 17(b), 18(a), 19(a), 24(a, c, d), 27(b)
- Part C (Fellowships).	1(a), 2(a), 3, 6(a, b), 7, 17(b), 18(a), 19(a), 20, 24, 27(b)
- Part D (Personnel Development).	1(a), 2(a), 3, 6(a, b), 7, 17(b), 18(a 19(a), 20, 22, 24(a, b, c, d), 27(b)
- Part F (Career Education Personnel Development)	1(a), 2(a), 3, 5, 6(a, b), 7, 17(b), 19(a), 20, 24(a, b, c, d), 27(b), 28
Elementary and Secondary Education Act	
- Title VIII (Dropout Prevention)	1(a), 2(a), 3, 7, 18, 24(a, b, c), 27(b)
Center for Educational Technology.	1(a), 2(a), 3, 7, 18(a), 24(b, c)
National Center for Educational Statistics	2(a), 7, 8, 9, 23, 24(b, c), 26(c), 27(a)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR DEVELOPMENT (continued)	
Other Programs	
Drug Education	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)
Environmental Education	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)
Health and Nutrition	1(a), 2(a), 3, 7, 18, 24(a, b, c), 27(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
DEPUTY COMMISSIONER FOR MANAGEMENT.	15, 32, 33(b, c, d)
Office of Planning, Budgeting, and Evaluation.	2(a), 7, 8, 9, 24(b, c), 25, 26(b, d), 27(c)
Contracts and Grants Division.	1
DEPUTY COMMISSIONER FOR EXTERNAL RELATIONS.	10, 15, 32, 33(b, c, d)
Office of Public Affairs	2(a), 4, 7, 16, 17(c), 21, 24(b)
Office of Committee Management	33(a)
Office of Legislation.	18(a), 19(a)
OTHER PROGRAMS	
Teacher Corps.	1(a), 2(a), 3, 6(b), 7, 17(b), 18, 19(a 20, 24(a, b, c, d), 27(b)
Right to Read	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
NEW PROGRAMS	
Higher Education Act	
- Title IV (Institutional Aid)	1(a), 2(a), 3, 24(c)
(Bail Out)	1(a), 2(a), 3, 24(c)
(Basic Opportunity Grants)	1(a), 2(a), 3, 19(b), 24(a, c, d, e), 27(b)
(State Student Incentive Grants)	1(a), 2(a), 3, 24(a, c, d), 27(b)
(Supplemental EOG)	1(a), 2(a), 3, 19(b), 24(a, c, d, e), 27(b)
- Title IX (Graduate Programs)	1(a), 2(a), 3, 6(a), 7, 18(a), 19(a), 24(a, b, c, d), 27(b)
Fund for the Improvement of Postsecondary Education	1(a), 2(a), 3, 7, 18(a), 19(a), 20, 22, 24(a, b, c), 27(b), 28(b)
Community Colleges	1(a), 2(a), 3, 5(b), 7, 18(a), 19(a), 20, 24(a, b, c), 27(b)

Units Affected by Task Force Recommendations (continued)

OFFICE OF EDUCATION

Unit Affected	Recommendations
NEW PROGRAMS (continued)	
Occupational Education.	1(a), 2(a), 3, 4(a, c, d), 5, 7, 17(a, d), 18(a), 19(a), 20, 24(a, b, c), 27(b)
Indian Education.	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)
Consumer Education.	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)
Ethnic Heritage	1(a), 2(a), 3, 7, 18(a), 24(a, b, c), 27(b)

Units Affected by Task Force Recommendations (continued)

NATIONAL INSTITUTE OF EDUCATION

Unit Affected	Recommendations
COUNTERPARTS TO OFFICE OF EDUCATION STAFF	
Deputies	2(a), 3, 15, 32, 33(b, c, d)
Contracts and Grants Officers	1
Planning and Evaluation Staff	2, 7, 8, 9, 24(b, c), 25, 26(b), 27(c)
TASK FORCES	
Applied Studies	1(a), 2(a), 3, 4(a, c, d), 7, 8, 9, 17(a), 24(b, c), 26(a), 27(b)
Researcher Training	1(a), 2(a), 3, 6(a), 7, 17(b), 20 24(a, b, c, d), 27(b)
New Initiatives	1(a), 2(a), 3, 4(a, c, d), 7, 8, 9, 17(a, d), 22, 24(b, c), 26(a), 27(b)
Career Education	1(a), 2(a), 3, 4(a, c, d), 5, 7, 15, 17(a, d), 22, 24(a, b, c), 26(a), 27(b)

Units Affected by Task Force Recommendations (continued)

NATIONAL INSTITUTE OF EDUCATION

Unit Affected	Recommendations
TASK FORCES (continued)	
Dissemination	1(a), 2(a), 3, 4(a, c, d), 7, 24(b, c)
Experimental Schools	1(a), 2(a), 3, 7, 22, 24(a, b, c), 27(b)
Field Initiated Studies	1(a), 2(a), 3, 4(a, c, d), 7, 8, 9, 24(b, c), 26(a), 27(b)

APPENDIX D

IMPLEMENTING THE RECOMMENDATIONS OF THE HEW WOMEN'S ACTION PROGRAM

The Women's Action Program Report, transmitted to Secretary Richardson in January 1972, contained twenty-one recommendations on improving the impact of OE programs on women. Proposing ways to implement these recommendations is one of this Task Force's mandates.

Since January, some recommendations were incorporated into new sex discrimination legislation; a few others were implemented by the Office of Education. In the course of its investigation, this Task Force found that reorganizing the remaining recommendations would facilitate their implementation--especially where responsibility for action was not clearly delegated, and where proposed action was not explicitly detailed.

The following pages offer an agenda for implementing the WAP recommendations. Task Force comments appear in italics beneath each WAP recommendation.

The Office of Education should evaluate its programs in career education and counseling to determine the extent to which they contribute to, or might counteract, sex stereotyping in health service occupations (see page 55 in WAP Report).

Recommendation #25 on evaluation includes assessing the impact of OE programs on men and women served. See page 64.

Recommendations #26a and #26b on research studies include the effects of counseling on career choice. See page 64.

In order to assure equal access for women to education programs, legislation should be developed by the Office of Education to include sex as a prohibited basis for discrimination in the admission of students by educational institutions (see page 70 in WAP Report).

Title IX of P.L. 92-318, enacted last June, prohibits most institutions from discriminating in admissions on the basis of sex.

Recommendation #11 requests coverage for most of those institutions exempted. See page 42.

The Office of Education should make efforts to insure that opportunities are available for women to enter traditionally male fields in graduate school (see page 70 in WAP Report).

Recommendation #6 concerns equalizing the proportion of men and women in all levels and in all areas of education through training programs. See page 40.

The Office of Education's evaluation panels of outside consultants to review proposals should include more women (see page 70 in WAP Report).

Recommendation #33 applies to consultants, by raising the proportion of women used as consultants to 50 percent of the total, and by adopting a standard fee for compensating consultants regardless of salary, experience, or other considerations. See page 74.

In the pending legislation for graduate study support, authority should be provided to identify, periodically, specific subject areas of need for doctoral training. Recruitment efforts in these fields should particularly emphasize the enrollment of women and minorities (see page 71 in WAP Report).

Recommendation #6 concerns equalizing the proportion of men and women in all levels and in all areas of education through training programs. See page 40.

The program guidelines for Higher Education Personnel Fellowships should continue to emphasize fellowship projects for women among the high priority areas for funding. Institutions should be encouraged to develop exemplary, replicable programs designed to meet the needs of women; e.g., part-time programs for older women. Support on a multi-year basis could be provided to interested, approved applicants to develop and implement experimental programs to attract women to "traditionally male" fields (see page 71 in WAP Report).

Recommendation #6 includes attracting members of one sex to fields traditionally dominated by the other sex. See page 40.

Recommendation #18, 20, and 21 address the problems of women returning to education. See pages 56-57.

Recommendation #19 covers promoting part-time study opportunities. See page 56.

Recommendation #28b covers a 10 percent set-aside in selected programs to be spent on projects making a special contribution to equal educational opportunity for women. See page 72.

Program regulations should state that sex should not be a factor in admission of participants to projects. This procedure would apply not only to new projects but also to refunded projects (see page 71 in WAP Report).

Title IX of P.L. 92-318 prohibits this kind of discrimination.

Recommendation #1 deals with including a statement on Title IX in program regulations. See page 38.

The ethnic group and sex of applicants for and awardees of fellowships should be reported. Recruitment procedures should also be described (see page 71 in WAP Report).

Recommendation #24d requests information on the sex of applicants and awardees of fellowships. See page 63.

The representation of women on the National Advisory Council on the Education Professions should be increased (see page 71 in WAP Report).

Recommendation #33 concerns increasing the membership of women on advisory councils to 50 percent of the total. See page 74.

The Office of Education should consider development of an evaluation procedure for determining the impact of on-going continuing education programs for women, including course offerings, availability of course credit, transfers of previous credit, provision for part-time study, counseling services, types of instruction methods and materials, financial aid opportunities, providing of child care services, relationship of continuing education program to sponsoring institution (see page 71 in WAP Report).

With initial funding from HEW's Office of Planning and Evaluation, OE is administering the pilot phase of a study intended to gather data on women's difficulties in securing access to continuing education. This study was initiated at the request of the Women's Action Program.

Recommendation #25 covers evaluation of the impact of OE programs on women. See page 64.

The Office of Education should consider sponsoring an experimental adult learning situation for women to determine motivation to learn, effective means of instruction, pertinent instructional materials, and effect of previous nonacademic experience on self-concepts and approach to learning. It would incorporate features such as resource centers on available opportunities for women, child care facilities, course work credit for relevant nonacademic experiences, flexible curricula to meet specific needs of ethnic group women, procedures to alleviate or eliminate administrative encounters with institution (see page 72 in WAP Report).

Recommendation #2 includes providing information and technical assistance on Title IX and its implication to State education personnel and others. See page 38.

Recommendation #14 instructs the Office for Civil Rights to work directly with the States to overcome present inequities. See page 45.

Recommendation #33 addresses increasing the membership of women on advisory councils to 50 percent of the total. See page 74.

The Office of Education should consider requesting a legislative amendment which specifies that for a state to be eligible for federal assistance for vocational education, it must submit for approval by the Office of Education a five-year plan for equalizing vocational education programs for both sexes (see page 78 in WAP Report).

Recommendation #1 covers submitting an assurance of compliance to Title IX of P.L. 92-318. See page 38.

Recommendation #5 includes eliminating sexism in career preparation. See page 40.

The Office of Education should study the extent and type of public school courses limited predominantly to one sex or in which one sex is given preference. Tie in with efforts just beginning in the Office of Civil Rights to collect vocational education enrollment by race, so that sex is collected simultaneously. Include programs at all levels; secondary schools, post-secondary institutions (including trade and technical schools, junior and community colleges, MDTA programs, etc.) (see page 79 in WAP Report).

Recommendation #23 includes acquiring enrollments by sex in each subject area. See page 61.

Recommendation #23 includes a recommendation to collect enrollment data by sex for institutions offering vocational education.

The Office of Education should analyze data currently available from such sources as its Bureau of Adult, Vocational and Technical Education and the Women's Bureau, and provide for collection of information needed to pinpoint areas of sex discrimination in vocational education, including:

- o region, demographic characteristics of institutions, level of instruction, ethnicity of students enrolled (full-time and part-time);

- o sex-typing promoted by instruction;
- o differentials in expected salary, growth potential, and job market; and
- o attitudes of counselors, teachers, administrators, parents and students toward integrating courses and institutions (see pages 79-80 in WAP Report).

Recommendation #23 includes a recommendation to collect enrollment data by sex for each type of vocational institution. See page 61.

Recommendation #23 includes acquiring information on secondary school enrollments in vocation fields by sex.

Recommendation #25 includes analysis of the impact of sex discrimination in each program area. Differentials in expected salary and growth potential would be explored. See page 64.

Recommendation #26 is concerned with the effects of attitudes of school personnel, parents and students on career choice. See page 64.

The Office of Education, in developing new curricula and instructional materials in career education, should place emphasis on "de-sexing" instruction and encouraging equal participation of both sexes in all courses and schools (see page 80 in WAP Report).

Recommendation #5 includes involving students of both sexes in all education activities. See page 40.

Recommendation #4 includes insuring that all instructional materials be free of sex biases. See page 39.

Recommendation #17 includes fostering educational approaches which encourage children of both sexes to explore new roles. See page 52.

Recommendation #28b covers a 10 percent set-aside in selected programs to be spent on projects making a special contribution to equal opportunity for women. See page 72.

Recommendations #18, 19, 20, and 22 include the support of projects for women returning to education. See pages 56-57.

Recommendation #28b covers a 10 percent set-aside in selected programs for projects making a special contribution to equal opportunity for women. See page 72.

The Office of Education should consider conducting a study to:

(1) determine teacher, counselor and parent attitudes and expectations concerning males and females in elementary, secondary, and post-secondary institutions and

(2) design model teacher and counselor training programs which create an awareness of sex-role stereotyping and sensitize prospective teachers and counselors to their impact influence on girls and women and

(3) compare professional counseling with peer group counseling in changing stereotyped attitudes (see page 72 in WAP Report).

Recommendation #17 covers the development of materials on sex biases in personnel training programs. See page 52.

Recommendations #26b and 26d include several related R&D efforts. See page 64.

Recommendation #28b covers a 10 percent set-aside in selected programs for projects making a special contribution to equal opportunity for women. See page 72.

Legislation should be developed by the Office of Education specifying that all HEW-supported vocational education programs shall be conducted without sex discrimination (see page 78 in WAP Report).

Title IX, P.L. 92-318 prohibits sex discrimination in vocational education.

The Office of Education should encourage state advisory councils, within the restriction of their membership requirements, to increase the number and percentage of women members so as to better respond to the needs of women. State councils should be requested to submit to the Commissioner of Education a list of current members and their expiration dates, along with plans for recruiting minorities and women (see page 78 in WAP Report).

The Bureau of Adult, Vocational and Technical Education in the Office of Education should consider encouraging and supporting states to establish training programs to increase the skills and upgrade the status of household workers (see page 83 in WAP Report).

Since the mid-1960's some $3 million went into MDTA demonstration projects for women in household work. OE developed a training and administration manual as a result of these projects. No new efforts have been initiated since the WAP Report was transmitted.

Success of these training programs is greatly hampered by the exclusion of household workers from the Fair Labor Standards Act; they need not be paid the minimum wage.

Recommendation #28b includes a 10 percent set-aside in selected programs which could fund projects in the area. See page 72.

The problems and needs of domestic workers should be scheduled as an issue for analysis in the Department's planning guidance system. The analysis should be conducted by the Social and Rehabilitation Service in coordination with the Office of Education, the Social Security Administration and the Office of the Assistant Secretary for Planning and Evaluation (see page 83 in WAP Report).

We urge OE to cooperate with the Social and Rehabilitation Service in its analysis.

The Office of Education, through adult and continuing education programs (Bureau of Adult, Vocational, and Technical Education), should broaden opportunities for older women to participate in career education programs, expanded offerings in history, economics, literature, art, music and the crafts should be encouraged. Any special courses for this age group should be free or moderately priced, and adapted to the needs and interests of older women. The expanded use of radio and TV programming, particularly during the day, should be encouraged to reach older women in their homes or other residences (see pages 89-90 in WAP Report).

Recommendations #18, 19, 20, 21 and 22 refer to women returning to education. See pages 56-57.

Recommendation #28b covers a 10 percent set-aside in selected programs to be spent on projects making a special contribution to equal opportunity for women. See page 72.